

# Exhibit D

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LISA BARBOUNIS,	)	CIVIL ACTION - LAW
	)	
Plaintiff	)	
	)	
-vs-	)	NO. 2:19-cv-05030
	)	
THE MIDDLE EAST FORUM, et	)	
al.,	)	
	)	
Defendants	)	
_____	X	

\* \* \*

The recorded video deposition of GREGG ROMAN,  
taken remotely via Zoom, on Friday, November 20,  
2020, beginning at 11:28 a.m., before Carrie A.  
Kaufman, Registered Professional Reporter and Notary  
Public in and for the Commonwealth of Pennsylvania.

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Marc Fink (Via Zoom)  
Lisa Reynolds Barbounis (Via Zoom)

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<p>1 THE VIDEO SPECIALIST: We are now 2 on the record. Today's date is Friday, 3 November 20th, 2020, and the time is 4 11:28 a.m. Eastern.</p> <p>5 This is the recorded video 6 deposition of Gregg Romano in the matter 7 of Lisa Barbounis versus Middle East 8 Forum, et al., in the United States 9 District Court, Eastern District of 10 Pennsylvania, Case Number 2:19-CV-05030-GAM.</p> <p>11 My name is Margaret Susuni, and 12 I'm with Everest Court Reporting, and 13 I'm the video specialist. The court 14 reporter today is Carrie, also from 15 Everest Court Reporting.</p> <p>16 All counsel appearing today will 17 be noted on the stenographic record.</p> <p>18 Will the court reporter please 19 swear in the witness.</p> <p>20 ---</p> <p>21 G R E G G R O M A N 22 WAS CALLED AND HAVING BEEN DULY SWORN 23 WAS EXAMINED AND TESTIFIED AS FOLLOWS: 24 ---</p> <p>25 MR. CARSON: So we're back on the</p>	<p>1 I gave, I'll just start by asking you to please state 2 your full name for the record.</p> <p>3 A. Gregg, G-r-e-g-g, Eric, E-r-i-c, Roman, 4 R-o-m-a-n.</p> <p>5 Q. Okay. And I think you said you have 6 another name that you're known by. Do you want to 7 please say that name as well?</p> <p>8 A. Sure. It's my Israeli name, which is 9 -- I'll say it rather fast and I'll break it down for 10 you. Gavriel Yisrael Ben Ze'ev Halevi Vi'adal. 11 Okay? G-a-v-r-i-e-l, space, Y-i-s-r-a-e-l, space, 12 B-e-n, space, Ze'ev, Z-e-'-e-v, space, H-a-l-e-v-i, 13 space, Vi'adal, V-i-'-a-d-a-l. That's it.</p> <p>14 Q. Okay. And you said earlier you were 15 born in Lexington, Kentucky, on May 21st, 1985, 16 correct?</p> <p>17 A. That's correct.</p> <p>18 Q. And your educational background, I 19 think you said it began at Medill Bair High School in 20 ninth grade; is that correct?</p> <p>21 A. Well, it began when I was -- before 22 then I -- the first place I ever studied wasn't 23 Medill Bair. I mean, I had elementary school, 24 kindergarten, middle school. But my secondary 25 education started in ninth grade at Medill Bair High</p>
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<p>1 record and we had some technical 2 difficulties so this is going to be the 3 beginning of a deposition transcript.</p> <p>4 One correction. The witness's 5 name, the party's name, is Gregg Roman, 6 R-o-m-a-n, so -- I think -- I think you 7 said Romano before, so I just wanted to 8 let you know it's Roman.</p> <p>9 And we started the deposition with 10 some instructions for today. I'm not 11 going to go through them all again 12 because Mr. Roman has heard them, but I 13 will just ask, Mr. Roman, you are aware 14 that you're under oath and your 15 testimony today has the same force and 16 effect as if you were appearing at a -- 17 you know, in a trial, at a courtroom, 18 you're under oath, and so you have an 19 obligation to tell the truth today; you 20 understand that.</p> <p>21 THE WITNESS: Yes.</p> <p>22 ---</p> <p>23 EXAMINATION</p> <p>24 BY MR. CARSON:</p> <p>25 Q. So subject to the earlier instructions</p>	<p>1 School in the Pennsbury School District in Fairless 2 Hills, Pennsylvania.</p> <p>3 Q. And are you a graduate of Pennsbury 4 High School?</p> <p>5 A. No, I went to three high schools, so I 6 was getting into this, and this is sort of like, you 7 know, a theme that's formative from education and 8 kind of connects later on, but -- so Medill Bair High 9 School wasn't until ninth grade. I was a pretty good 10 wrestler, folkstyle wrestler, in high school. So I 11 went from Medill Bair to a private school in 12 Princeton, New Jersey, called the Hun School, H-u-n 13 School. I was there for tenth and eleventh grade. 14 And then as a result of recruiters from different 15 universities saying, look, you can try to do a prep 16 school or you can try to go back in the public 17 school, I was already in the NJISAA, which is the 18 sort of New Jersey sports association, so I decided 19 to go to a public school in Jersey, which was 20 Hopewell Valley Regional High School, HVRSD, in 21 Mercer County, and from there I graduated. So I 22 graduated from Hopewell Valley Regional School 23 District in 2003. I guess -- do you want me to 24 continue with college and stuff or what?</p> <p>25 Q. Sure. Sure. Go ahead. Tell me what</p>

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<p>1 your educational background is after high school.</p> <p>2 A. Sure. So I attended the American</p> <p>3 University in Washington D.C. from I guess August of</p> <p>4 2003 to December of 2005, and during that time I had</p> <p>5 about like four or five other educational programs.</p> <p>6 I was in Yeshiva, which is sort of like a Jewish</p> <p>7 seminary, in Jerusalem, in December of 2004, I was in</p> <p>8 -- sort of like a field school from the Jewish</p> <p>9 agency, which is a quasi-governmental organization in</p> <p>10 Israel, in Haifa and in Jerusalem, and I had all</p> <p>11 these different experiences over there, so I decided</p> <p>12 to move from Washington to Israel, in the middle east</p> <p>13 Israel, in -- I guess the decision was reached in</p> <p>14 December of '05, and I made the move to study an</p> <p>15 intensive Hebrew and Arabic program at Haifa</p> <p>16 University -- Haifa is H-a-i-f-a -- in July of 2006,</p> <p>17 but about two days after I moved there the Second</p> <p>18 Lebanon War broke out. So I went from Haifa</p> <p>19 University to learn academics and I actually became a</p> <p>20 firefighter in Israel, and I attended the basically</p> <p>21 quickest fire academy, if you want to call it that,</p> <p>22 or rescue academy, for what's called Ichud Hatzalah,</p> <p>23 which is the rescue service in Israel, where I was a</p> <p>24 member of the civil guard, and that civil guard --</p> <p>25 and this is still educational, Mr. Carson, it's not</p>	<p>1 and that took place in July of 2010 I think, and then</p> <p>2 I got out of the army and went to the Ministry of</p> <p>3 Defense Reserves in October of 2010, I want to say,</p> <p>4 and then I went back to the IDC Herzliya, which was</p> <p>5 the college that I was at prior to my army</p> <p>6 enlistment, and I stopped studying -- I was doing</p> <p>7 political communications and national security</p> <p>8 studies there until May of 2012 and -- my daughter</p> <p>9 was born then, and then I stopped studying then to</p> <p>10 take a job in Pittsburgh where I then continued my</p> <p>11 studies at the Katz Graduate School of Business at</p> <p>12 the University of Pittsburgh where I was a joint sort</p> <p>13 of like lecturer and I audited classes. I have done</p> <p>14 some continue education since there, but, Mr. Carson,</p> <p>15 I never actually obtained my bachelor's degree, so I</p> <p>16 have about seven years of college under my belt but</p> <p>17 I'm missing those few credits to finish it. And so</p> <p>18 that's education but doesn't include the professional</p> <p>19 development. I just want to try to provide as clear</p> <p>20 a -- complete an answer as possible.</p> <p>21 Q. No, that was a thorough answer for</p> <p>22 sure. It sounds like you have a degree in the</p> <p>23 college of life to me, but -- sometimes worth more</p> <p>24 than a bachelor's degree, but let me jump forward</p> <p>25 ahead and --</p>
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<p>1 like -- you know, it's unconventional, okay, but it's</p> <p>2 still -- I would categorize it as educational. So I</p> <p>3 was a member of the civil guard's education program</p> <p>4 from June of -- July of 2006 until about September of</p> <p>5 2006, and then there in parallel I resumed my</p> <p>6 university studies at a place called the</p> <p>7 Interdisciplinary Center, IDC, Herzliya,</p> <p>8 H-e-r-z-l-i-y-a, I did that for a year, and then I</p> <p>9 actually got drafted -- I didn't volunteer, I got</p> <p>10 drafted, into the Israeli Army, so my university</p> <p>11 studies stopped there, and then I was first in a</p> <p>12 basic training in a place called Nitzan, N-i-t-z-a-n,</p> <p>13 which is in the south of the country, and then I went</p> <p>14 to the school for government and -- this is all as</p> <p>15 part of the Israeli Defense Forces, a place called</p> <p>16 Rishon Lezion, R-i-s-h-o-n L-e-z-i-o-n, and that was</p> <p>17 in December and January, December of 2008 and January</p> <p>18 of 2009, and then Operation Cast Lead broke out, so</p> <p>19 again a war interrupted with my studies, and I was on</p> <p>20 the frontlines in a place called Sderot, S-d-e-r-o-t,</p> <p>21 then the war ended, then I went back to the college</p> <p>22 for government, part of the IDF, in February of 2009,</p> <p>23 I graduated from that, and then I went to the school</p> <p>24 for advanced Israeli and Judaic studies, which was</p> <p>25 part of the Israel Defense Forces' education corps,</p>	<p>1 A. Sure.</p> <p>2 Q. -- just kind of talk about your -- talk</p> <p>3 about your -- your work history. I see that you went</p> <p>4 to the University of Pittsburgh for a year?</p> <p>5 A. I didn't go to the University of</p> <p>6 Pittsburgh, I taught at the University of Pittsburgh</p> <p>7 and audited classes, but that was like -- to really</p> <p>8 understand that, you have to understand the</p> <p>9 educational -- so I've had like three professional</p> <p>10 lines here. Okay? One was government, the second</p> <p>11 was academic, and the third is private.</p> <p>12 Q. Is it around the -- tell me when you</p> <p>13 were teaching at the University of Pittsburgh,</p> <p>14 please.</p> <p>15 A. So it was a class called scenario</p> <p>16 planning, which is sort of like the combination of</p> <p>17 politics and strategy and how it applies to business</p> <p>18 decisions, and that was I want to say -- I want to</p> <p>19 say it was probably spring of 2013, and -- but then I</p> <p>20 had a course that I did through the Hillel Jewish</p> <p>21 University Center, which was after that -- Hillel is</p> <p>22 an online -- not online, it's a Jewish university --</p> <p>23 I mean -- how -- what's the best way to describe it.</p> <p>24 Jewish campus life. Right? So I had multiple years</p> <p>25 of involvement with that, but at Katz specifically I</p>



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<p>1 was there January -- it was either January 2013 or  2 September 2013, it was either the spring semester or  3 that fall, but I had involvement with the school as  4 what they call an executive lecturer, guest lectures,  5 doing programs. We had an incubator that we ran from  6 the Pittsburgh Israel Business Council. So I was  7 involved with the school for about three years.  8 Okay? But as a functional lecturer there was  9 probably only one or two semesters. I judged  10 competitions every semester, but, you know, the  11 involvement -- let's just say this. It started when  12 I moved to Pittsburgh in the fall of 2012 and it went  13 through September of 2015 when I ran my last external  14 lecture program through Hillel Jewish University  15 Center.</p>	<p>1 totally different management structures.  2 Q. So can you please just quickly kind of  3 compare your experience with the JCRC with the Middle  4 East Forum --  5 A. You want me to -- you want to compare  6 the JCRC with the Middle East Forum so -- can you be  7 more specific?  8 Q. Can you please compare your job with  9 the JCRC with your position at the Middle East Forum?  10 A. Yeah, so first I would have to tell you  11 what my job with the JCRC was. Is that fair?  12 Q. Go ahead. Yeah.  13 A. Okay. So with the JCRC we had  14 responsibility for about 18 to 19 different domestic  15 policy issues that were affecting the Jewish  16 community of western Pennsylvania, specifically  17 Allegheny County, Butler County, Beaver County,  18 Ligonier County, all the way up to Erie, up and down,  19 for population of about 48,000 Jews in western PA,  20 but, beyond that, it was about both building  21 harmonious relationships within the Jewish community  22 and beyond the Jewish community, so if you're talking  23 about tax relief, nonprofit relief, if you're talking  24 about assistance to the elderly, neighborhood  25 inclusion zones, OBIDs, opportunity for business</p>
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<p>1 diversity inclusion effort in Pittsburgh; and then  2 Vibrant Pittsburgh, which was meant for leveling the  3 playing field for minorities in the city and an area  4 called the Power of 32, which was the -- today you  5 would call it an economic opportunity zone, but it  6 was western Maryland, West Virginia, eastern Ohio,  7 and all of western Pennsylvania -- it's like west of  8 Altoona would be the area.  9 Q. What was your position at the Jewish  10 Federation of Greater Pittsburgh?  11 A. Well, the title was director of the  12 Jewish Community Relations Council, director of the  13 JCRC, but I had about nine other titles that was sort  14 of like part of that title at the position.  15 Q. What was the work you did as director  16 of the JCRC similar to the work you're doing with the  17 Middle East Forum?  18 A. Can you rephrase the question? I  19 didn't get it.  20 Q. I guess I'm -- the title director of  21 the JCRC is -- you were the director of the JCRC,  22 today I believe you're the director of the Middle  23 East Forum; is that correct?  24 A. Yes; however, two totally different  25 jobs with totally different responsibilities on two</p>	<p>1 improvement districts, education, anything that  2 touched the Jewish community as part of a public  3 policy interest both domestic within the Jewish  4 community around the city of Pittsburgh and beyond  5 the city of Pittsburgh; for instance, representation  6 in Harrisburg, representation in Washington D.C.,  7 even international issues, antisemitism in Europe and  8 even going to Israel. We had about like three or  9 four times a year that we found ourselves in Israel  10 because of local Jewish community interests in  11 Pittsburgh that then sort of intersected with the  12 sister city of Karmiel Misgav, that's K-a-r-m-i-e-l  13 M-i-s-g-a-v, in the north -- I guess northeast of  14 Israel between like the Sea of Galilee and the Golan  15 Heights, and the main responsibility there was sort  16 of like an interface between the volunteers of the  17 community and the interests of the federated Jewish  18 community, one being the laymen and the other being  19 the professionals. So that was the second element of  20 this. You had all the public policy interest but  21 then you have the interest of all the groups. So we  22 were involved with the NAACP, with the urban league,  23 with the mainline protestant community, with the  24 Anglican church, with the city of Pittsburgh  25 including Mayor Bill Peduto, County Executive Rich</p>

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<p>1 Fitzgerald. You know, going beyond that, different 2 congressmen, Senator Toomey and Senator Casey, 3 Governor Wolf and before that Governor Corbett. So 4 every day was really a different public policy 5 challenge. Now, beyond that we also had to make sure 6 that we did Jewish community policy, so, you know, 7 you would go to the mayor and he's saying, hey, what 8 does the Jewish community think about policy X. So 9 we did reproductive health, we did civic inclusion, 10 did what you might call affirmative action, we were 11 involved with racial disparities, equality, the 12 necessity for social justice depending on the way you 13 look at it, but it could also be something like 14 vaccines or whatever. You know? If there was a 15 question to that, you would have to do it. But 16 beyond telling the mayor about that, you also had the 17 media relationships. So Pittsburgh Post-Gazette, 18 Pittsburgh Tribune, anything dealing with national 19 media and -- so there is also, like, Jewish segmented 20 media, so you have the Jewish Telegraphic Agency, you 21 have the Jewish Exponent, you know, in Philadelphia 22 but also the Pittsburgh Jewish Chronicle. So 23 anything that dealt with Jewish community interests 24 in short is what was the job responsibilities for the 25 JCRC, but it was sort of just all within the section</p>	<p>1 director at the Jewish Federation of Greater 2 Pittsburgh, how many people worked there -- 3 A. I was never the director at the Jewish 4 Federation of Greater Pittsburgh. 5 Q. Okay. Tell me what your job is at the 6 Middle East -- well, let me -- I guess let me set it 7 up first. When did you first start working at the 8 Middle East Forum? 9 A. I think August of 2015 or September of 10 2015. 11 Q. And when you first were hired with the 12 Middle East Forum what was your first position? 13 A. I guess the title was director. Well, 14 it was kind of a codirectorship, so director and 15 director. 16 Q. Was there another director who was 17 there at the time? 18 A. Yes. 19 Q. Who was that? 20 A. Amy Shargel. 21 Q. Shargel? 22 A. Yeah. 23 Q. Can you spell it? 24 A. S-h-a-r-g-e-l or j-e-l. It was like 25 five years ago.</p>
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<p>1 of public affairs. Now, there was a management 2 responsibility insofar as it dealt with community 3 building and building capacity of external 4 organizations, so there was -- 5 Q. How many people did you manage? 6 A. One, internally. 7 Q. That was like one direct report, is 8 that how you called it? 9 A. I would say it wasn't -- it was like a 10 third of a direct report I guess because it was an 11 individual who was shared across different -- it was 12 certainly not like what I had had in the army where I 13 had about like 30 direct reports. 14 Q. How many people were employed at the 15 Jewish Community Center? 16 A. Well, it's not the Jewish Community 17 Center. I don't know. 18 Q. Sorry. 19 A. It's the Jewish Federation. 20 Q. Yeah, the JCRC. Sorry about that. 21 A. No one was employed at the JCRC. 22 Q. The Jewish Federation of Greater 23 Pittsburgh -- 24 A. That's not the JCRC. 25 Q. Sorry about that. When you were the</p>	<p>1 Q. At some point in time did Amy Shargel 2 leave the Middle East Forum and then you became the 3 director, is that how it happened? 4 A. Well -- no, it's a little bit more 5 complicated than that. 6 Q. You can explain it if you want. 7 A. Okay. So she retired but the job 8 responsibilities that Amy Shargel were not the same 9 job responsibilities that I had. So when you talk 10 about director, it's just a name. Okay? It's not a, 11 you know, one director does this, one director does 12 that; there has been multiple directors of MEF. 13 Q. Is it fair to say it's the name of the 14 position that is the second highest in the corporate 15 structure? 16 A. No, I don't think that's fair. 17 Q. Well, what would -- in a corporate 18 structure, in a hierarchy, Daniel Pipes has the 19 highest position; is that right? 20 A. No, he doesn't. 21 Q. Who has the highest position? 22 A. Steve Levy, the chairman of the 23 organization. 24 Q. And then work down from there and kind 25 of explain that hierarchy for me, please.</p>



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<p>1 A. Well, it's not a hierarchy, you know, 2 you're -- you're giving me a factual predicate that 3 doesn't exist, so I can't really answer the question.</p>	<p>1 Q. So which board were you talking about 2 when you said he's a member of the board?</p>
<p>4 Q. Okay. Well, underneath Steve Levy, if 5 he's the chairman, who would be like the next person 6 who would be responsible for, like, policy at the 7 Middle East Forum?</p>	<p>4 A. I'm not sure. He's I think member of 5 the -- well, there is the board, there is the board 6 of governors, okay, but the board of governors is a 7 board that also exists in addition to the founders 8 board, and both boards don't have any executive 9 authority but he's still a member of them.</p>
<p>8 A. Everyone is responsible for policy at 9 the Middle East Forum.</p>	<p>9 Q. What is the board of governors, what is 10 that?</p>
<p>10 Q. Interns are responsible for policy?</p>	
<p>11 A. Well, it depends what you mean by 12 everyone.</p>	<p>11 A. It's a group of donors who give a 12 minimum amount to the organization and is updated 13 every once in a while with Middle East Forum news.</p>
<p>13 Q. I guess --</p>	<p>13 Q. In order to be a member of the board of 14 governors do you have to donate a certain amount of 15 money?</p>
<p>14 A. And what policy you're talking about.</p>	<p>14 A. No.</p>
<p>15 Q. For creating Middle East Forum 16 policies.</p>	<p>15 Q. Like, is the -- what is the minimum 16 amount that you said that someone has to donate to be 17 on the board of governors?</p>
<p>17 A. It depends on what you mean by Middle 18 East Forum policy. I can't answer the question if 19 you're not specific.</p>	<p>17 A. I said they may donate a minimum 18 amount, but they may not as well.</p>
<p>20 Q. All right. Let me try to be more 21 specific. So if Steve Levy is the chairman, what 22 would Daniel Pipes' position be?</p>	<p>20 Q. What is that amount?</p>
<p>23 A. Well, Daniel Pipes's position isn't 24 predicated on Steve Levy's position.</p>	<p>23 A. Well, depends on the individual.</p>
<p>25 Q. What is his position?</p>	<p>24 Q. Well, for instance, like, if I wanted 25 to be on the board of governors, could I donate a certain amount of money and then I would be on the board of governors?</p>
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<p>1 A. Daniel's position -- Daniel actually 2 has multiple positions, so you have to be specific of 3 what position you're asking about.</p>	<p>4 A. No.</p>
<p>4 Q. Well, what are they? What are the 5 multiple positions?</p>	<p>5 Q. Is there like an -- like, you know, 6 hey, if -- anyone who donates 20,000 we'll give them 7 the title of board of governors, does it work like 8 that?</p>
<p>6 A. Of Daniel Pipes?</p>	<p>9 A. No.</p>
<p>7 Q. Yes.</p>	<p>10 Q. Okay. How does it work? How does one 11 become a member of the board of governors?</p>
<p>8 A. He's the publisher of the Middle East 9 Quarterly. He is the editor-in-chief of the 10 organization. He sits on multiple boards outside of 11 the Middle East Forum that sort of act as the liaison 12 position he has. He is the -- I guess the titular 13 name is president of the Middle East Forum, but he 14 has sort of like -- again, it fluctuates. He's the 15 president but then he's also a member of the board, 16 he's also a member of the executive committee, and 17 there's different people who have different 18 intersecting roles within MEF. So, you know, he 19 might have a few more positions and titles that I 20 don't remember.</p>	<p>12 A. Each individual has a unique path that 13 they take to get to the board of governors.</p>
<p>21 Q. Fair enough. What is the board?</p>	<p>14 Q. Okay. And -- since we got into that, 15 let's just -- let me do it like this. Is there a 16 difference between -- strike that.</p>
<p>22 A. Which board?</p>	<p>17 What are the officers -- on the website 18 there is a list of officers, and I'll represent to 19 you it says president, Daniel Pipes; chairman, Steve 20 Levy; vice chairman, Joshua Katzen; treasurer, 21 Lawrence Hollin; secretary, Gregg Roman. What is 22 that?</p>
<p>23 Q. You said he's also a member of the 24 board. What --</p>	<p>23 A. They're the officers on the website.</p>
<p>25 A. Well, there is multiple boards.</p>	<p>24 Q. But what is that -- what is the 25 importance of being an officer? What is the</p>

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<p>1 relevance of that? What does it mean to be an 2 officer?</p> <p>3 A. Well, they're listed on the website, so 4 that's the importance of it, that it's important 5 enough for us to put it on the website.</p> <p>6 Q. But do they have any other roles other 7 than being listed on the website? Is there any, 8 like, responsibilities that come with those 9 positions?</p> <p>10 A. Could you be more specific? There is 11 no connection between --</p> <p>12 Q. Sure.</p> <p>13 A. -- the website and their jobs or 14 anything else.</p> <p>15 Q. Well, I guess, for instance, it says 16 secretary, Gregg Roman. What does that mean that 17 you're the secretary of the -- what does that mean 18 that you're the secretary?</p> <p>19 A. It's a honorific given by virtue of 20 being an officer of the organization.</p> <p>21 Q. Do you have any responsibilities as the 22 secretary?</p> <p>23 A. Yes.</p> <p>24 Q. What are those responsibilities?</p> <p>25 A. They are to keep the minutes from the</p>	<p>1 after November of 2018.</p> <p>2 Q. But when did you -- when did you become 3 the secretary?</p> <p>4 A. I became the secretary in -- I don't 5 recall. I would have to check the records.</p> <p>6 Q. Can you estimate? Was it in 2018? 7 2017?</p> <p>8 A. No.</p> <p>9 Q. It wasn't in 2017?</p> <p>10 A. No.</p> <p>11 Q. Was it in 2018?</p> <p>12 A. No.</p> <p>13 Q. Was it in 2019?</p> <p>14 A. No.</p> <p>15 Q. Was it in 2020?</p> <p>16 A. No.</p> <p>17 Q. So then that leaves 2016 and '15 then, 18 right?</p> <p>19 A. Maybe '15 or '16.</p> <p>20 Q. And how many times has there been a 21 meeting of the executive committee since 2016?</p> <p>22 A. From what I remember, probably 23 annually.</p> <p>24 Q. And do you attend those annual 25 meetings?</p>
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<p>1 -- I guess you would call it the executive committee 2 meeting, and to transmit that to the executive 3 committee.</p> <p>4 Q. And do you, in fact, do those 5 responsibilities?</p> <p>6 A. When?</p> <p>7 Q. At the executive committee meetings?</p> <p>8 A. Can you be more specific? Because 9 there is multiple meetings.</p> <p>10 Q. Sure. When was the last executive 11 committee meeting?</p> <p>12 A. When was the last executive committee 13 meeting for what?</p> <p>14 Q. For anything. When is the last time 15 there was a meeting?</p> <p>16 A. Well, the last time that there was a 17 meeting I wouldn't remember because I wasn't the 18 secretary. I can tell you this. I can represent to 19 you that the last meeting that I remember was in 20 March of 2018.</p> <p>21 Q. How long have you been secretary?</p> <p>22 A. Well, like I said, just like the 23 position of director is just a name, secretary up 24 until November 1st of 2018 was a position that had 25 certain authority and then that authority changed</p>	<p>1 A. Do I attend which annual meetings?</p> <p>2 Q. The annual meetings of the executive 3 committee.</p> <p>4 A. Some I have and some I haven't.</p> <p>5 Q. Are they ever held more than once a 6 year?</p> <p>7 A. Depends on the year.</p> <p>8 Q. Well, has there ever been a year when 9 there's been more than one meeting of the executive 10 committee since you became --</p> <p>11 A. I can't --</p> <p>12 Q. -- secretary?</p> <p>13 A. Since I became secretary, yes.</p> <p>14 Q. Has there ever been a year since you 15 became secretary when there's been more than two 16 meetings of the executive committee?</p> <p>17 A. Yes.</p> <p>18 Q. Has there ever been a year since you 19 became secretary when there's been more than three 20 meetings?</p> <p>21 A. Yes.</p> <p>22 Q. What's -- I guess what's the most 23 amount of meetings that you recall being in a single 24 year of the executive committee? Since --</p> <p>25 A. I can't give you an accurate</p>

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<p>1 representation because I don't remember.</p> <p>2 Q. Just to make it clear, if we're asking</p> <p>3 questions today about your position as secretary, all</p> <p>4 the questions will be relegated -- I'm not asking you</p> <p>5 to answer questions about times when you weren't on</p> <p>6 the executive committee, so it's all relegated to</p> <p>7 that time between 2015 and the present when you were</p> <p>8 the secretary. Okay?</p> <p>9 A. Well, no, because there is -- can I</p> <p>10 offer sort of a footnote here to what the reason why</p> <p>11 I'm not specific and not sure? Is that okay?</p> <p>12 Q. Uh-huh. Yeah.</p> <p>13 A. So the responsibilities that I had as</p> <p>14 secretary of the executive committee were of a</p> <p>15 certain amount from the time that I believe 2015 or</p> <p>16 '16, I don't want to say that I know a hundred</p> <p>17 percent, but to the best of my recollection in 2015,</p> <p>18 '16, is when I had that title added as one of my</p> <p>19 roles at MEF, and then that title in terms of the</p> <p>20 name may have been on documents, but the authority</p> <p>21 vested in that title was removed in I want to say</p> <p>22 November -- I'm not going to give the exact date, but</p> <p>23 the authority vested as a officer of the organization</p> <p>24 was removed and has not been returned since early</p> <p>25 November of 2018.</p>	<p>1 there a way to do that?</p> <p>2 A. Yeah, you -- I think the videographer</p> <p>3 did it before.</p> <p>4 THE VIDEO SPECIALIST: Do you have</p> <p>5 an option up on top of the screen where</p> <p>6 it gives you a set of names that you can</p> <p>7 share it with, and one of the names</p> <p>8 should be Mr. Roman.</p> <p>9 MR. CARSON: It says you are</p> <p>10 screen sharing, and when I hover over</p> <p>11 that it says participants?</p> <p>12 THE VIDEO SPECIALIST: Yeah,</p> <p>13 select one of the -- see if Mr. Roman is</p> <p>14 one of the participants.</p> <p>15 MR. CARSON: He is.</p> <p>16 THE VIDEO SPECIALIST: Okay.</p> <p>17 MR. CARSON: When I click on it,</p> <p>18 nothing happens, though.</p> <p>19 THE VIDEO SPECIALIST: Nothing</p> <p>20 happens when you click on his name?</p> <p>21 MR. CARSON: I hover over it, it</p> <p>22 says participants, 13 --</p> <p>23 THE VIDEO SPECIALIST: Yeah,</p> <p>24 Mr. Roman, see if you can take over the</p> <p>25 mouse.</p>
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<p>1 Q. Who removed that authority?</p> <p>2 A. Daniel Pipes.</p> <p>3 Q. How did he tell you that that authority</p> <p>4 was going to be removed?</p> <p>5 A. It was communicated to me in a letter I</p> <p>6 believe in November of 2018.</p> <p>7 Q. I'm going to show you an exhibit.</p> <p>8 A. Sure.</p> <p>9 Q. I might have that letter. Okay. So it</p> <p>10 will be 51 -- hold on. So -- let me just do a screen</p> <p>11 share. So I'm going to do a screen share and share a</p> <p>12 document that is -- so this document I'll represent</p> <p>13 to you is a document that was turned over, produced</p> <p>14 by your lawyers during the course of discovery, and</p> <p>15 your lawyers put Bates stamps on these documents, and</p> <p>16 you can see the document I'm producing, which we'll</p> <p>17 call it Roman 1, Roman Exhibit 1, will be the</p> <p>18 document that's Bates stamped 000049, 50, 51, and 52.</p> <p>19 And -- so this letter is dated November 6th, 2018,</p> <p>20 and just take a minute and look at it. If you want</p> <p>21 me to scroll down, let me know and I'll scroll down.</p> <p>22 A. Would you mind giving me the ability to</p> <p>23 scroll myself so I can read at my own time?</p> <p>24 Q. Yeah, I don't really know how to do</p> <p>25 that, but I don't have a problem doing that. Is</p>	<p>1 THE WITNESS: Here, I'm requesting</p> <p>2 remote control.</p> <p>3 THE VIDEO SPECIALIST: Yeah, see</p> <p>4 if you can take over.</p> <p>5 MR. CARSON: Oh, approve.</p> <p>6 THE WITNESS: I'm just</p> <p>7 representing to you, Mr. Carson, that I</p> <p>8 am reading this document. Is that okay?</p> <p>9 MR. CARSON: Okay. Yeah. Thank</p> <p>10 you. Take your time.</p> <p>11 BY MR. CARSON:</p> <p>12 Q. My first question is, just when you're</p> <p>13 done, is this the letter you're talking about.</p> <p>14 A. Well, I'm not sure, because there is a</p> <p>15 note here that has a mistake. Effective November 5th</p> <p>16 your job description has chanted. And I don't</p> <p>17 remember ever having a offer like this with a</p> <p>18 spelling mistake. So I can't verify this is the</p> <p>19 document that I'm talking about.</p> <p>20 Q. Well, I'll represent to you this</p> <p>21 document came from you guys, so --</p> <p>22 A. That's fine that it came from us, but</p> <p>23 it doesn't have a log of the files, it doesn't have</p> <p>24 metadata associated with a file that may have been</p> <p>25 given to me.</p>

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<p>1 Q. Well, did --</p> <p>2 A. I would request -- I would request that</p> <p>3 if there is such a document which is the changes of</p> <p>4 my employment and we do have it on our system that</p> <p>5 the counsel for MEF do provide this to Mr. Carson.</p> <p>6 Is that fair, Jon?</p> <p>7 (Simultaneous speakers.)</p> <p>8 BY MR. CARSON:</p> <p>9 Q. Yeah, I mean do you remember receiving</p> <p>10 a document like this around November 6th, 2018?</p> <p>11 A. Well, there's receiving a document like</p> <p>12 it and then there's receiving the document that I'm</p> <p>13 talking about. So if you want me to be specific, and</p> <p>14 I would like to offer as much specificity as</p> <p>15 possible, I cannot say with a hundred percent</p> <p>16 validity that this document is something -- this</p> <p>17 document that you're representing to me as something</p> <p>18 that's been handed over by MEF's counsel is something</p> <p>19 that I received.</p> <p>20 Q. So I'm just asking you do you remember</p> <p>21 receiving a document like this, and by like this I</p> <p>22 just mean a document that you received from Daniel</p> <p>23 Pipes around November 6th, 2018, where he changed</p> <p>24 your job responsibilities with the Middle East Forum.</p> <p>25 A. Again, "like this" is a comparable</p>	<p>1 A. Yeah, I'm still the director today.</p> <p>2 Q. And you kept your title when you</p> <p>3 received that letter in November of 2018?</p> <p>4 A. Well, title as in the name or title as</p> <p>5 in the position?</p> <p>6 Q. Title as in the name. You kept -- you</p> <p>7 keep -- you keep the title of director is what I</p> <p>8 believe he said to you, do you remember that?</p> <p>9 A. Well, again, you're representing</p> <p>10 something that whether or not this is --</p> <p>11 Q. I'm not asking you to confirm the</p> <p>12 document; I'm just asking you if you remember that he</p> <p>13 -- you got to keep your title as director.</p> <p>14 A. Can the stenographer please read back</p> <p>15 the question?</p> <p>16 Q. She doesn't have to read back the</p> <p>17 question. I'm not asking that question. I'm asking</p> <p>18 if you remember that you kept your title as</p> <p>19 director --</p> <p>20 A. I kept the name director as it related</p> <p>21 to the name but not the title. Title and name is two</p> <p>22 different things.</p> <p>23 Q. Okay. I don't know -- what's the</p> <p>24 difference between the title and the name in your</p> <p>25 mind?</p>
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<p>1 term. I did receive a document from Daniel Pipes in</p> <p>2 November of 2018 which changed the terms of my</p> <p>3 employment. Whether or not it's this --</p> <p>4 Q. And --</p> <p>5 A. -- document, I cannot verify that this</p> <p>6 is the specific document that I received.</p> <p>7 Q. Well, let's kind of just go down the</p> <p>8 list and see what's -- see if there is anything you</p> <p>9 remember different. So do you remember the document</p> <p>10 that you received you kept your title as director?</p> <p>11 A. Again, you're asking me to remember a</p> <p>12 document that I don't know whether or not it's in</p> <p>13 front of me, so if you would like --</p> <p>14 Q. I'm asking you if you kept --</p> <p>15 A. -- if you would like to ask me about</p> <p>16 that document, the specific document, of my change of</p> <p>17 employment -- and I believe I had to sign it, so if</p> <p>18 that exists, then that's something that I'm sure that</p> <p>19 we can refer to you, but --</p> <p>20 Q. Did -- do you --</p> <p>21 A. -- in -- if you'll just --</p> <p>22 Q. Mr. Roman, I'm just asking if you</p> <p>23 remember if you kept your title.</p> <p>24 A. If I kept my title of what?</p> <p>25 Q. Director.</p>	<p>1 A. Sure. So you could call me Mr. Roman,</p> <p>2 but Mr. Roman might represent Mr. Roman me or</p> <p>3 Mr. Roman being married, so if you want to say title</p> <p>4 of director, as it's represented in that document, I</p> <p>5 would have to see the document, because I remember</p> <p>6 there was -- there was a debate that took place over</p> <p>7 what the exact title and responsibilities were to be</p> <p>8 associated with that word director itself.</p> <p>9 Q. So you remember you kept the name</p> <p>10 director; is that what your testimony --</p> <p>11 A. Yes, if you say director -- like, my --</p> <p>12 in my signature block, Gregg Roman, director, Middle</p> <p>13 East Forum, that was in the signature block of</p> <p>14 e-mails, yes, that's a fair representation.</p> <p>15 Q. It never changed.</p> <p>16 A. To the best of my knowledge the name in</p> <p>17 my signature block never changed.</p> <p>18 Q. You were the director before November</p> <p>19 of 2018 and you've been the director since November</p> <p>20 of 2018, correct?</p> <p>21 A. What do you mean director? Because,</p> <p>22 like I said beforehand, the job director has changed</p> <p>23 at multiple times as I've been at MEF -- the name</p> <p>24 stayed the same but the responsibilities changed.</p> <p>25 Q. Okay. So we're -- I guess let's talk</p>



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<p>1 about the name then. You were named director before</p> <p>2 November 2018 and you've been named director since</p> <p>3 November 2018; is that fair to say?</p> <p>4 A. The name, the position name director,</p> <p>5 has remained the same since I've been hired, yes,</p> <p>6 that's correct.</p> <p>7 Q. Do you remember that your</p> <p>8 responsibilities were -- so if we read the</p> <p>9 responsibilities section, you will have the following</p> <p>10 responsibilities, managing the Forum's external</p> <p>11 projects and initiatives, including all the directors</p> <p>12 of the Forum's projects except the Middle East</p> <p>13 Quarterly editor; fundraising, in meetings, on the</p> <p>14 telephone, and in writing; making media appearances</p> <p>15 on Forum-related topics. Does that sound like a good</p> <p>16 description of your responsibilities pursuant to when</p> <p>17 you received the letter, whether it was this letter</p> <p>18 or another letter, in November 2018?</p> <p>19 A. No.</p> <p>20 Q. What's different about this list versus</p> <p>21 what you did?</p> <p>22 A. Well, this list has responsibilities</p> <p>23 that were inclusive but not wholly inclusive, so it</p> <p>24 might say that I was supposed to do these things, but</p> <p>25 there were other responsibilities that were added</p>	<p>1 November of 2018?</p> <p>2 A. Not in totality, no.</p> <p>3 Q. To some degree you did?</p> <p>4 A. To some degree that's fair to say.</p> <p>5 Q. Did you do fundraising, in meetings, on</p> <p>6 the telephone, and in writing after November 2018?</p> <p>7 A. Yes.</p> <p>8 Q. Did you do media appearances on</p> <p>9 Forum-related topics?</p> <p>10 A. When?</p> <p>11 Q. After November of 2018. And we're</p> <p>12 talking about when your job responsibilities changed,</p> <p>13 right? So did you continue to do media appearances</p> <p>14 on Forum-related topics?</p> <p>15 A. Yes and no.</p> <p>16 Q. Are these restrictions accurate after</p> <p>17 your position -- after you received the letter --</p> <p>18 strike that.</p> <p>19 Did your -- after you received the</p> <p>20 letter in November of 2018 -- and can we -- can we</p> <p>21 just kind of pin down the date? Is it fair to say</p> <p>22 you received that letter at the beginning of November</p> <p>23 2018, if you don't know the exact date?</p> <p>24 A. Again, I don't know this specific</p> <p>25 letter that you're showing me is something that I --</p>
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<p>1 that I didn't have prior to November of 2018.</p> <p>2 Q. So I think what you're saying, correct</p> <p>3 me if I'm wrong, is you did these three things but</p> <p>4 there is other things you did as well.</p> <p>5 A. No, that's not what I'm saying.</p> <p>6 Q. Okay. Correct me, please.</p> <p>7 A. Correct you about the inclusive</p> <p>8 responsibilities listed in this document or direct</p> <p>9 you --</p> <p>10 Q. Take it line by line. So managing the</p> <p>11 Forum's external projects and initiatives, including</p> <p>12 all the directors of the Forum's formal projects</p> <p>13 except the Middle East Quarterly editor, that's --</p> <p>14 A. Right.</p> <p>15 Q. -- bullet point 1. Did you keep that</p> <p>16 responsibility after November of 2018?</p> <p>17 A. The specific managing the Forum's</p> <p>18 external projects and initiatives, including all the</p> <p>19 directors of the Forum's formal projects except the</p> <p>20 Middle East Quarterly editor, we would have to go</p> <p>21 project by project to tell you about what the</p> <p>22 responsibilities were prior to twenty -- November of</p> <p>23 2018 and then after, because that did change.</p> <p>24 Q. Well, did you continue to manage the</p> <p>25 Forum's external projects and initiatives after</p>	<p>1 Q. No, we've established that.</p> <p>2 A. -- received. Yeah.</p> <p>3 Q. We're not -- so I'm not trying to make</p> <p>4 you say that -- I'm not trying to trick you. I'm</p> <p>5 just trying to ask you if the letter you received</p> <p>6 was, say, between November 1st and November 10th,</p> <p>7 2018.</p> <p>8 A. I don't know. I would have to see the</p> <p>9 letter.</p> <p>10 Q. Do you remember it being -- do you</p> <p>11 remember whether there was a meeting around November</p> <p>12 5th, 2018?</p> <p>13 A. Can you be more specific?</p> <p>14 Q. Yeah.</p> <p>15 A. Your question was was there a meeting</p> <p>16 around November 5th of 2018. I've been in a lot of</p> <p>17 meetings, Mr. Carson. I'm not sure what you're</p> <p>18 referring to.</p> <p>19 Q. Yeah. I guess you can interpret the</p> <p>20 question to mean was there a meeting anywhere on the</p> <p>21 planet Earth in November, so let me be more specific.</p> <p>22 So around November 5th, 2018, it's my</p> <p>23 understanding that there was a meeting held at the</p> <p>24 Middle East Forum where the people who worked in the</p> <p>25 Philadelphia office all attended. Do you recall</p>

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<p>1 that?</p> <p>2 A. I wasn't at any meeting.</p> <p>3 Q. But do you recall that that meeting was</p> <p>4 held?</p> <p>5 A. Do I recall that a meeting was held on</p> <p>6 November 5th of 2018 of the Forum staff in</p> <p>7 Philadelphia that did not involve me? Yes, I</p> <p>8 remember hearing that there was a meeting that was</p> <p>9 supposed to take place, and I can't tell you whether</p> <p>10 it took place because I wasn't there, but I heard</p> <p>11 that there was a meeting that took place on November</p> <p>12 5th, 2018, of the Forum staff in Philadelphia, but,</p> <p>13 again, wasn't there, so I can't tell you what</p> <p>14 happened.</p> <p>15 Q. And who told you about that meeting?</p> <p>16 A. Well, multiple people told me about</p> <p>17 that meeting.</p> <p>18 Q. Who was the first person to tell you</p> <p>19 about it?</p> <p>20 A. I don't remember.</p> <p>21 Q. Was Daniel Pipes one of the people who</p> <p>22 told you about it?</p> <p>23 A. About the meeting that took place on</p> <p>24 November 5th, 2018?</p> <p>25 Q. Correct.</p>	<p>1 where he was told not to go. It relates</p> <p>2 to the investigation. You guys are</p> <p>3 clearly going to make a Faragher-Ellerth</p> <p>4 argument in this case where you're going</p> <p>5 to talk about the investigation, you're</p> <p>6 going to talk about the meeting, so it's</p> <p>7 not privileged.</p> <p>8 MR. GOLD: My directive stands, so</p> <p>9 you're free to do as you please.</p> <p>10 MR. CARSON: Okay.</p> <p>11 THE WITNESS: Mr. Carson --</p> <p>12 BY MR. CARSON:</p> <p>13 Q. Why didn't --</p> <p>14 A. Can I just ask you a question for a</p> <p>15 second? Are you okay if I get up and I adjust the</p> <p>16 window?</p> <p>17 Q. Yeah.</p> <p>18 A. Okay.</p> <p>19 Q. Yeah. You don't have to ask me that.</p> <p>20 A. I don't want to, like, ruin the</p> <p>21 stenographic record or whatever the video thing.</p> <p>22 THE VIDEO SPECIALIST: We're off</p> <p>23 the record.</p> <p>24 THE WITNESS: Back on. Sorry</p> <p>25 about that.</p>
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<p>1 A. I actually don't remember if Daniel</p> <p>2 told me about it. I do remember that there was a</p> <p>3 memo that went out and then -- that memo said a</p> <p>4 meeting was going to be held, and then I was</p> <p>5 specifically told not to attend.</p> <p>6 Q. Who told you not to attend?</p> <p>7 A. That information is privileged.</p> <p>8 Q. It's not -- even if Marc Fink told you</p> <p>9 not to attend it's not privileged.</p> <p>10 A. I'll rely on advice of counsel whether</p> <p>11 I can answer that question or not.</p> <p>12 MR. GOLD: Direct you not to</p> <p>13 answer the question.</p> <p>14 MR. CARSON: Not privileged,</p> <p>15 Mr. Gold.</p> <p>16 MR. GOLD: Take it to the Court.</p> <p>17 MR. CARSON: I mean, we can call</p> <p>18 if you really want me to.</p> <p>19 MR. GOLD: Go ahead. Feel free to</p> <p>20 do so.</p> <p>21 MR. CARSON: I mean, we have other</p> <p>22 issues to talk to the Court about anyway</p> <p>23 today, but it's not privileged if Marc</p> <p>24 Fink told him. You guys included me on</p> <p>25 all the e-mails that Marc Fink was on</p>	<p>1 MR. CARSON: Take a break any time</p> <p>2 you need to today.</p> <p>3 THE WITNESS: I'm good, I just</p> <p>4 wanted to -- got this light thing going</p> <p>5 on here, so I don't want to mess up the</p> <p>6 video for you guys.</p> <p>7 BY MR. CARSON:</p> <p>8 Q. Why didn't you attend the meeting</p> <p>9 pursuant to the memo on March 5th, 2018?</p> <p>10 A. That information is privileged.</p> <p>11 Q. Were you told not to?</p> <p>12 A. What did you say?</p> <p>13 Q. Were you told not to?</p> <p>14 A. I believe that my answer on the record</p> <p>15 stands.</p> <p>16 Q. Were you invited to the meeting</p> <p>17 originally?</p> <p>18 MR. GOLD: Asked and answered.</p> <p>19 THE WITNESS: I believe my answer</p> <p>20 stands.</p> <p>21 BY MR. CARSON:</p> <p>22 Q. You can answer again. Asked and</p> <p>23 answered isn't an instruction not to answer the</p> <p>24 question.</p> <p>25 A. But I'm saying I believe that my answer</p>



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<p>1 on the record stands.</p> <p>2 Q. We're not going to make the court</p> <p>3 reporter read stuff back all day, so just answer</p> <p>4 again, please. Were you originally invited --</p> <p>5 MR. GOLD: Mr. Carson, I direct</p> <p>6 him not to answer. It's been asked and</p> <p>7 answered.</p> <p>8 MR. CARSON: I'm going to call the</p> <p>9 Court.</p> <p>10 MR. GOLD: Go ahead.</p> <p>11 MR. CARSON: Give me a second.</p> <p>12 THE VIDEO SPECIALIST: We are off</p> <p>13 the record --</p> <p>14 MR. CARSON: Could we go off the</p> <p>15 record, too?</p> <p>16 THE VIDEO SPECIALIST: We're off</p> <p>17 the record. It's 12:21 p.m. Eastern.</p> <p>18 (A discussion was held off the record.)</p> <p>19 MR. GOLD: You know what, in order</p> <p>20 to save time, just answer the question,</p> <p>21 Mr. Roman. Were you invited to the</p> <p>22 meeting originally?</p> <p>23 THE WITNESS: I believe that I</p> <p>24 said on the record --</p> <p>25 MR. CARSON: We're not on -- are</p>	<p>1 Q. What was the meeting about?</p> <p>2 A. I don't know, Mr. Carson.</p> <p>3 Q. You have no idea what that meeting was</p> <p>4 about.</p> <p>5 A. Mr. Carson, I can't --</p> <p>6 Q. You understand you're under oath.</p> <p>7 A. Mr. Carson, I can't -- I can't tell you</p> <p>8 about a meeting that I did not attend.</p> <p>9 Q. But you understand you're under oath</p> <p>10 today, right? So if you know what the meeting is</p> <p>11 about and you say you don't know, that's a lie and</p> <p>12 that's perjury; you do get that, right?</p> <p>13 A. Mr. Carson --</p> <p>14 MR. GOLD: Mr. Carson, please save</p> <p>15 your accusations when you get in front</p> <p>16 of a jury. I'm not going to allow you</p> <p>17 to harass the witness or try to</p> <p>18 embarrass the witness. Just rephrase</p> <p>19 the question, let's move along.</p> <p>20 MR. CARSON: No.</p> <p>21 BY MR. CARSON:</p> <p>22 Q. You do understand what perjury is,</p> <p>23 right?</p> <p>24 A. Mr. Carson, I am aware what perjury is,</p> <p>25 yes.</p>
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<p>1 we on the record right now?</p> <p>2 MR. GOLD: Yeah, back on the</p> <p>3 record. I'm going to allow him to</p> <p>4 answer that question whether he was</p> <p>5 originally invited to the meeting.</p> <p>6 THE WITNESS: I'll repeat what I</p> <p>7 said beforehand. I received a memo that</p> <p>8 there was going to be a meeting on</p> <p>9 November 5th, 2018, in the</p> <p>10 Philadelphia's office.</p> <p>11 BY MR. CARSON:</p> <p>12 Q. Did that memo instruct you to be at the</p> <p>13 meeting?</p> <p>14 A. I did not construe that memo as an</p> <p>15 invitation; however, if you have a copy of the memo I</p> <p>16 would be happy to look at it and give you my</p> <p>17 interpretation of it.</p> <p>18 Q. Have you ever read the memo since then?</p> <p>19 A. No, I have not.</p> <p>20 THE COURT REPORTER: I didn't hear</p> <p>21 that question, Mr. Carson. What was it?</p> <p>22 BY MR. CARSON:</p> <p>23 Q. Have you ever read the memo since that</p> <p>24 meeting?</p> <p>25 A. No, I don't remember.</p>	<p>1 Q. Okay. So if you know something and you</p> <p>2 deny knowledge to it, that's perjury. You understand</p> <p>3 that, right?</p> <p>4 A. Mr. Carson, I would appreciate it if</p> <p>5 the stenographer can read back the question that</p> <p>6 you're asking me to reference in terms of whether I</p> <p>7 know what perjury is or is not.</p> <p>8 Q. She -- my question to you is, if you</p> <p>9 deny having knowledge of something that you have</p> <p>10 knowledge of, you understand that that's perjury,</p> <p>11 right?</p> <p>12 A. Yes, Mr. Carson.</p> <p>13 Q. Okay. So with that understanding, do</p> <p>14 you have any idea what the November 5th, 2018,</p> <p>15 meeting was about?</p> <p>16 A. Mr. Carson, again, if you're asking</p> <p>17 me --</p> <p>18 Q. Yes or no --</p> <p>19 A. No, it's not a yes or no question</p> <p>20 because there is an explanation here that has to --</p> <p>21 Q. No, actually it is.</p> <p>22 A. No, there's not, Mr. Carson.</p> <p>23 Q. If you know what the meeting was about.</p> <p>24 A. If you'll please allow me to answer, I</p> <p>25 would be happy to.</p>

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<p>1 Q. I'll allow you to say whatever you</p> <p>2 want, but begin your answer by saying whether you</p> <p>3 knew what the meeting was about, yes or no.</p> <p>4 A. Mr. Carson, I am aware that a memo went</p> <p>5 out prior to November 5th, 2018, that described a</p> <p>6 situation at the Middle East Forum, and to get to</p> <p>7 that specific situation we would have to see the memo</p> <p>8 right now, and then that meeting was one that I did</p> <p>9 not attend, so if you're asking me that if I know</p> <p>10 exactly what happened at that meeting, I cannot give</p> <p>11 you an honest answer because I wasn't there.</p> <p>12 Q. That wasn't my question. Do you know</p> <p>13 generally what that meeting was about?</p> <p>14 A. Well, generally --</p> <p>15 Q. Sitting here today.</p> <p>16 A. Sitting here today I know that I have</p> <p>17 reviewed a two and a half page document which was</p> <p>18 minutes and notes from that meeting, so if you're</p> <p>19 asking me about the minutes as they represented what</p> <p>20 happened at that meeting, I can comment on that if</p> <p>21 you'll show me them, but if you're asking me what</p> <p>22 happened at the meeting, I was not there.</p> <p>23 Q. So I'm -- it's a very simple question.</p> <p>24 Do you know generally what the meeting was about?</p> <p>25 A. No, Mr. --</p>	<p>1 meeting was about.</p> <p>2 A. Again to say that if I was at the</p> <p>3 meeting or if I wasn't at the meeting, my general</p> <p>4 understanding of what took place is that there</p> <p>5 were accusations that were made against me by members</p> <p>6 of MEF staff and those accusations were discussed</p> <p>7 with MEF staff. That's the general character of what</p> <p>8 I understood took place at the meeting.</p> <p>9 Q. What's your understanding of what those</p> <p>10 accusations were?</p> <p>11 A. Whose accusations?</p> <p>12 Q. The ones made at the meeting.</p> <p>13 A. Well, it depends because from what I</p> <p>14 understand there were many accusations, so if you</p> <p>15 want to ask me about a specific accusation, I can</p> <p>16 give you my opinion.</p> <p>17 Q. No, I'm asking you generally what</p> <p>18 accusations do you recall there being.</p> <p>19 A. Generally there was discontent with my</p> <p>20 management style and that's what was broached at the</p> <p>21 meeting.</p> <p>22 Q. Was those accusations limited to</p> <p>23 discontent of your management style?</p> <p>24 A. You would have to ask the people at the</p> <p>25 meeting regarding the specifics, but based on the</p>
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<p>1 MR. GOLD: Mr. Carson, he just</p> <p>2 answered that he had read the minutes</p> <p>3 and he now knows what the meeting was</p> <p>4 about.</p> <p>5 BY MR. CARSON:</p> <p>6 Q. He now knows.</p> <p>7 A. I would like to correct that record of</p> <p>8 your representation what you're saying I now know and</p> <p>9 also Mr. Gold's representation. I am aware -- I am</p> <p>10 aware --</p> <p>11 Q. Either you know or you don't.</p> <p>12 A. No, it's not yes or no, it's not black</p> <p>13 and white, it's not a binary question.</p> <p>14 Q. Okay.</p> <p>15 A. I know that there are minutes of a</p> <p>16 meeting that took place on November 5th, 2018, that I</p> <p>17 have reviewed and I know what's in those minutes.</p> <p>18 That is what I'm representing to you.</p> <p>19 Q. What was it about? What was the</p> <p>20 meeting about?</p> <p>21 A. In those minutes that are raised I</p> <p>22 would be happy to review them and comment on that</p> <p>23 document, but it's not in front of me right now.</p> <p>24 Q. I'm not putting it in front of you.</p> <p>25 I'm asking you what your knowledge is about what the</p>	<p>1 memo that I saw, there was a wide range of issues</p> <p>2 that were brought up regarding the general topic of</p> <p>3 discontent with my management style at that meeting,</p> <p>4 but, again, Mr. Carson, I wasn't there so I can't</p> <p>5 tell you.</p> <p>6 Q. Well, did anyone ever talk to you about</p> <p>7 the meeting afterwards?</p> <p>8 A. That is privileged information.</p> <p>9 Q. It's only privileged if it comes from</p> <p>10 your lawyer.</p> <p>11 A. The only discussions I've had regarding</p> <p>12 that meeting has been with counsel.</p> <p>13 Q. Daniel Pipes never talked to you about</p> <p>14 that meeting?</p> <p>15 A. Again, the only discussion that I've</p> <p>16 had has been in the presence of counsel.</p> <p>17 Q. So Daniel Pipes -- well, I'm asking you</p> <p>18 what Daniel Pipes said to you, not what your counsel</p> <p>19 said to you.</p> <p>20 A. About what?</p> <p>21 Q. Did Daniel Pipes -- did Daniel Pipes</p> <p>22 ever talk to you about that meeting?</p> <p>23 A. Daniel Pipes spoke to me about his</p> <p>24 general discontent with my management style, but he</p> <p>25 never broached to me, beyond anything that was</p>

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<p>1 written in a formal document that you may have in</p> <p>2 your possession, what it was that was specifically</p> <p>3 brought up at that meeting.</p> <p>4 Q. Daniel Pipes spoke to you generally</p> <p>5 about his discontent in your management style? Is</p> <p>6 that what --</p> <p>7 A. Oh, yeah. He really laid into me.</p> <p>8 Q. What did he say about discontent in</p> <p>9 your management style?</p> <p>10 A. Well, depends on what topic you're</p> <p>11 talking about, finances, we're talking about travel,</p> <p>12 or we're talking about policy, or talking about</p> <p>13 personnel matters. Please be more specific.</p> <p>14 Q. No, I'm not going to be more specific.</p> <p>15 I'm saying generally what did Daniel Pipes tell you</p> <p>16 what his discontent in your management style. If you</p> <p>17 want to begin in a certain area, you're welcome to do</p> <p>18 that, Mr. Roman.</p> <p>19 A. Yeah, well, he generally was not happy</p> <p>20 with my management style. That's the general answer.</p> <p>21 Q. Did he say anything else besides I'm</p> <p>22 not happy with your management style?</p> <p>23 A. There was many things that he said.</p> <p>24 Q. What were those things?</p> <p>25 A. Well, I've had -- I must have had</p>	<p>1 Mr. Carson, and, again, I'm asking you please be</p> <p>2 specific.</p> <p>3 Q. And I'm responding to your request by</p> <p>4 telling you that I am being specific in asking you</p> <p>5 what he's talked to you about pursuant to that</p> <p>6 meeting. So I can back up and set up the question.</p> <p>7 There was a meeting on November 5th,</p> <p>8 2018, and your testimony is that that meeting was</p> <p>9 about your management style, correct?</p> <p>10 A. That's what I believe the meeting was</p> <p>11 about. I'm not testifying that it was about that.</p> <p>12 I'm testifying to you that I saw a memo that went out</p> <p>13 that described the results of that meeting and what</p> <p>14 was allegedly discussed that, but, again, I wasn't</p> <p>15 there, I can't comment on something that I wasn't at.</p> <p>16 I can comment about what I heard. I can comment</p> <p>17 about what I heard. I can comment about what was</p> <p>18 conveyed to me. But I cannot tell you what happened</p> <p>19 at that meeting.</p> <p>20 Q. Well, you read the minutes of the</p> <p>21 meeting, correct?</p> <p>22 A. Yes, I did.</p> <p>23 Q. Okay. So based on everything you know</p> <p>24 about the meeting, reading the --</p> <p>25 A. Okay.</p>
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<p>1 dozens of conversations, hundreds, thousands of</p> <p>2 conversations with Daniel since I started working at</p> <p>3 the Middle East Forum, so, again, if you're asking</p> <p>4 about a specific conversation on a specific day, I</p> <p>5 would be happy to answer it, but you got to give me</p> <p>6 more specificity, Mr. Carson.</p> <p>7 Q. I'm talking to you about the --</p> <p>8 Mr. Pipes -- is it your testimony that Mr. Pipes</p> <p>9 spoke to you after the November 5th, 2018, meeting</p> <p>10 about the November 5th, 2018, meeting?</p> <p>11 A. Has he spoken to me about the meeting?</p> <p>12 I knew that there was a meeting taking place, but</p> <p>13 counsel informed me of that meeting, not Mr. Pipes.</p> <p>14 Q. Did Mr. Pipes ever speak to you about</p> <p>15 that meeting?</p> <p>16 A. Mr. Pipes I think was in a conversation</p> <p>17 with counsel that I was present at but I've been</p> <p>18 instructed to not discuss the contents of that</p> <p>19 conversation that took place with counsel, it's</p> <p>20 legally privileged.</p> <p>21 Q. So I'm asking you if -- what Mr. Pipes</p> <p>22 said to you. I'm not asking you what any lawyer said</p> <p>23 to you. Anything that Mr. Pipes said to you is not</p> <p>24 privileged.</p> <p>25 A. Mr. Pipes has said many things to me,</p>	<p>1 Q. -- reading the minutes, people talking</p> <p>2 to you about it, everything that you've ever heard</p> <p>3 about that meeting on November 5th, 2018, that --</p> <p>4 A. Sure.</p> <p>5 Q. -- occurred at the Philadelphia --</p> <p>6 based on that, my question is did Daniel Pipes ever</p> <p>7 talk to you about that?</p> <p>8 A. Daniel Pipes discussed with me the</p> <p>9 issues of my management style that were brought up at</p> <p>10 that meeting, yes, he did.</p> <p>11 Q. When did he do that?</p> <p>12 A. I don't remember.</p> <p>13 Q. Was it -- it was obviously after the</p> <p>14 meeting, correct?</p> <p>15 A. We've had many discussions about my</p> <p>16 management style that took place after that meeting.</p> <p>17 In fact, we probably discussed an issue with my</p> <p>18 management style only a few weeks ago. He is my</p> <p>19 direct -- he is my direct supervisor. He talks about</p> <p>20 my management style all the time.</p> <p>21 Q. Well, what -- okay. So -- I mean, we</p> <p>22 can get to the one that you had a couple weeks ago.</p> <p>23 A. Sure.</p> <p>24 Q. But let's talk about the meeting first.</p> <p>25 So when was the first time he came to you after the</p>

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<p>1 meeting to talk to you about what happened at the 2 meeting?</p> <p>3 A. I believe that he conveyed a letter to 4 me of the results of that meeting. There was no 5 formal conversation or informal conversation that 6 took place as a result. He had told me that -- he 7 had told me in this letter that he had communicated 8 to me that there had been an investigation, that he 9 had determined what would be the future of my role in 10 the organization, and as a result of the future of 11 that role in the organization my job was to change. 12 So that's sort of the --</p> <p>13 Q. Other than --</p> <p>14 A. -- that's sort of the milieu of the 15 progression of events that took place.</p> <p>16 Q. Other than that letter, was there any 17 other communications to you about what happened at 18 that meeting?</p> <p>19 A. There was not any further 20 communications beyond the letter that I received. 21 There were communications subsequent to this letter 22 which came up which further took away other 23 responsibilities that I had had at the Middle East 24 Forum. There was actually -- there must have been 25 six -- six or seven communications after November 6th</p>	<p>1 place both prior to my arrival to the organization 2 and after my arrival to the organization that take 3 place regarding any sort of formal complaint filed 4 against a staff member, and those --</p> <p>5 Q. Well, we're going to --</p> <p>6 A. -- those procedures --</p> <p>7 Q. We're going to deal with --</p> <p>8 A. I'm trying to provide some context for 9 the answer -- I can stop if you want me to.</p> <p>10 Q. Go ahead, finish. No, no, finish what 11 you're saying.</p> <p>12 A. Those procedures regarding complaints 13 are what the management staff of the organization 14 followed after, I think, both before, during, and 15 after, the November 5th, 2018, meeting that took 16 place that I saw the minutes of. So if you're asking 17 about six or seven different communications, there is 18 two ways we can do it. We can either show each 19 communication or I can recall to the best of my 20 recollection what took place, but I would like to be 21 able to reserve the right to offer a more specific 22 answer if you do ever produce something of a document 23 that I would be able to count on to correct the 24 record. Is that fair?</p> <p>25 Q. Yes, so that's fair, but before -- so</p>
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<p>1 of 2018 which either added new responsibilities or 2 removed responsibilities or benefits or remuneration 3 or pay. So this is not -- this letter that I 4 described previously, or the memo, contract, whatever 5 you want to call it, was not the be all end all of 6 the entire results of what happened on November 5th. 7 There was many many more things that happened after 8 that. That's why I'm trying to ask you to provide 9 specifics, because I want to be able to answer the 10 question in the most accurate truthful way possible, 11 Mr. Carson.</p> <p>12 Q. We're going to get there. So the --</p> <p>13 A. I'm trying to help you.</p> <p>14 Q. -- the six or seven communications that 15 you testified to just now that occurred after the 16 November 5th, 2018, meeting, all those communications 17 were electronic communications?</p> <p>18 A. Yes, we have never discussed any issues 19 that were of a nonlegal nature as they related to the 20 series of events of November 5th in a venue that did 21 not have the presence of counsel, and, more than 22 that, any allegation that was ever communicated to me 23 which had a formal legal conclusion were protected by 24 privilege. There is procedures in place, Mr. Carson, 25 at the Middle East Forum that have always been in</p>	<p>1 before we get into looking at --</p> <p>2 A. Sure.</p> <p>3 Q. -- documents, I just want to -- I want 4 to isolate what we're talking about, so --</p> <p>5 A. Sure.</p> <p>6 Q. -- there is -- you're talking about -- 7 what we're discussing right now all centers around 8 this November 5th, 2018, meeting; is that fair to 9 say?</p> <p>10 A. Well, I don't know if it's necessarily 11 fair to say because the November 5th, 2018, meeting 12 was a simulacrum of a bastion of different management 13 complaints, so --</p> <p>14 Q. A what?</p> <p>15 A. Okay. I'll try to rephrase that. The 16 --</p> <p>17 Q. Simulacrum?</p> <p>18 A. Yeah, simulacrum, s-i-m-u-l-a-c-u-r-m. 19 Okay? It was a collection --</p> <p>20 Q. Okay.</p> <p>21 A. -- or a medium --</p> <p>22 Q. I'll look that one up when we're on a 23 break.</p> <p>24 A. All right. Whatever. It was a medium 25 of different complaints about my management style,</p>



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<p>1 and as a result of those complaints that I saw in 2 those memo -- that I saw in that memo, both counsel, 3 management, and the leadership of the organization 4 took steps to correct any alleged actions that were 5 raised at that meeting. I mean, this process was 6 exhaustive, and I think that the document record and 7 also the testimony that I give here today will 8 reflect the exhaustive steps that Mr. Pipes, that 9 counsel, and that others, including your clients, 10 took to try to deal with whatever was said at that 11 meeting that I wasn't present at. So I can comment 12 on what happened after, but I can't comment on what 13 took place there at the meeting.</p> <p>14 Q. Let's just slow down for a second. So 15 --</p> <p>16 A. Sure.</p> <p>17 Q. -- what we're talking about has to do 18 with the meeting and these allegations, you've 19 characterized them as allegations about your 20 management style, but that -- those things all 21 occurred at the beginning of November and they led up 22 to the November 5th, 2018, meetings; is that what you 23 recall?</p> <p>24 A. No, I don't recall that. There was 25 actually other times that Mr. Pipes raised complaints</p>	<p>1 management issues.</p> <p>2 Q. Okay.</p> <p>3 A. And that's what filled the thing of the 4 -- the memo itself, if that's like a fair way 5 to categorize it.</p> <p>6 Q. If you want to characterize this -- 7 sorry. If you want to characterize them as 8 complaints about management issues, I'm fine -- as 9 long as we're talking about the same thing, I don't 10 care what we call them today. So --</p> <p>11 A. What are you talking about, Mr. Carson.</p> <p>12 Q. We're talking about the allegations 13 that some of these employees made in connection with 14 you that led to the November 5th, 2018, meeting. 15 Okay? So just so we understand that we're talking 16 about the same thing.</p> <p>17 A. I think we're maybe talking about two 18 different things.</p> <p>19 Q. Okay. So I'm talking about allegations 20 that specifically three people made around November 21 1st, 2018, Patricia McNulty, Lisa Barbounis, and 22 Marnie Meyer, and those -- these allegations that 23 these three people made culminated in a meeting on 24 November 5th, 2018. Is that what you understand? 25 A. That's part of what culminated in a</p>
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<p>1 about my management style and took corrective action 2 against me prior.</p> <p>3 Q. We're not talking --</p> <p>4 A. No, but I'm saying -- like you're 5 asking me in total is November 5th about that, and 6 it's not. Okay? Mr. Pipes --</p> <p>7 Q. Okay.</p> <p>8 A. -- has what I would call a 360 degree 9 review process as it relates to the people that 10 report to him, and I'm not the only person that's a 11 direct report. There is people at the Middle East 12 Forum that do not report to me. Okay? Still to this 13 day --</p> <p>14 Q. So --</p> <p>15 A. -- and even before November 5th there 16 was never a time where all individual staff members 17 at MEF reported to me. It is a complex organization.</p> <p>18 Q. I understand. But the meeting that was 19 in November 5th, 2018, was because certain people 20 made these -- made some allegations against you; is 21 that what you understand?</p> <p>22 A. That's what I understand, yes, that 23 they made allegations that included -- I estimate -- 24 if you look at the notes, this is just based on my 25 memory of it, about 90 percent had to do with</p>	<p>1 meeting on November 5th, 2018. There were other 2 issues that also from what I understand led to that 3 meeting taking place.</p> <p>4 Q. What are those issues? Can you just 5 name them like one at a time, just --</p> <p>6 A. I'll try to recall to the best of my 7 ability other things that may have led towards that.</p> <p>8 Q. Okay.</p> <p>9 A. There was a --</p> <p>10 Q. Give me --</p> <p>11 A. Yeah, I'll go through them as best as I 12 remember. Okay?</p> <p>13 Q. Just because this way we can talk about 14 it and --</p> <p>15 A. Yeah, yeah, fine, fine, and then if you 16 can just kind of like signpost. Okay? I understand 17 that anything -- notes that I write in this will be 18 made available to you because it's -- we're now under 19 oath, but are you okay with me just sort of listing 20 these so I also keep track of that? Is that fair?</p> <p>21 Q. Let me list them and then you -- you 22 say them and I'll list them --</p> <p>23 A. Right, but I would rather have a record 24 I can also look at so that if I write something -- 25 I'll give you the notes afterwards, I'm not going to</p>

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<p>1 refer to any documents that you don't have available</p> <p>2 --</p> <p>3 Q. Well, just give me the -- just give me</p> <p>4 the first one first. Let's just -- just give me --</p> <p>5 A. Yeah.</p> <p>6 Q. Other than the women's allegations,</p> <p>7 you're -- I think the list that you're trying -- that</p> <p>8 you want to make is a list of other reasons why these</p> <p>9 meetings happened other than these women's</p> <p>10 allegations; is that right?</p> <p>11 A. Sure. Sure. So it goes beyond that</p> <p>12 and I'm going to refer to the -- to what I remember</p> <p>13 here as what I think may have been the other reasons.</p> <p>14 Q. All right. Just give me the first</p> <p>15 thing.</p> <p>16 A. Sure. A complaint that Lisa Barbounis</p> <p>17 filed against Marnie Meyer on October 30th, 2018.</p> <p>18 Q. Okay.</p> <p>19 A. The second thing --</p> <p>20 Q. Can you say that date again?</p> <p>21 A. A complaint that Lisa Barbounis filed</p> <p>22 --</p> <p>23 Q. Filed against Marnie --</p> <p>24 A. -- against Marnie Meyer on October</p> <p>25 30th, 2018.</p>	<p>1 website by a company called Jump and then GoldenComm.</p> <p>2 Jump is a company in Kentucky; GoldenComm is a</p> <p>3 company in California I want to say, Newport Beach or</p> <p>4 Manhattan Beach.</p> <p>5 Q. Okay. So that's five.</p> <p>6 A. There was a complaint about Mr. Arthur</p> <p>7 Stein, who was a donor to the Middle East Forum and</p> <p>8 was the subject of a donation issue. There was a</p> <p>9 complaint that dealt with technology beyond that of</p> <p>10 the website, and that specific technological</p> <p>11 complaint dealt with a company called Hybros,</p> <p>12 H-y-b-r-o-s. There was -- and this is all just based</p> <p>13 on the minutes, so -- I mean, I guess you'll see this</p> <p>14 reflected, but if there is a disparity between what's</p> <p>15 in the minutes versus what I'm talking about, then I</p> <p>16 hope that you'll allow me to correct that. Is that</p> <p>17 fair?</p> <p>18 Q. Yeah, no one is going to hold you to</p> <p>19 anything -- you're doing this by memory, it's fine.</p> <p>20 A. I'm just doing this by memory, so I'm</p> <p>21 just trying to jog whatever came up from that memo</p> <p>22 that I saw.</p> <p>23 Q. It's also -- it's not a test, so --</p> <p>24 A. No, not saying a test; I'm trying to</p> <p>25 give you what I remember seeing from that memo.</p>
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<p>1 Q. Okay. What's number two?</p> <p>2 A. Number two is a complaint that Matthew</p> <p>3 Bennett filed against Marnie Meyer backing the</p> <p>4 complaint of Lisa Barbounis on October 30th of 2018.</p> <p>5 Q. All right. Number three.</p> <p>6 A. The third is is a complaint that Lisa</p> <p>7 Barbounis raised against Stacey Roman on October --</p> <p>8 I'm going to say it's in October of 2018, but I also</p> <p>9 think that was a subject of that meeting as well.</p> <p>10 Q. Okay. Is there anything else?</p> <p>11 A. Yeah, a complaint that Daniel Pipes had</p> <p>12 registered to me prior -- two times prior actually --</p> <p>13 to November 5th, 2018. The first would have been a</p> <p>14 continuation of a conversation that took place in</p> <p>15 2017 and the second was the continuation of a</p> <p>16 conversation that took place in 2018. I think</p> <p>17 probably November 5th, 2018, was the -- you know, the</p> <p>18 final event of what Daniel Pipes would -- I would</p> <p>19 characterize, I don't know how Daniel Pipes would</p> <p>20 characterize it, two years of Daniel Pipes's</p> <p>21 frustration with my management style.</p> <p>22 Q. All right. So that's four things that</p> <p>23 we have. Is there any more?</p> <p>24 A. Yeah, I think that there was a</p> <p>25 complaint that dealt with the construction of a</p>	<p>1 Again, I'll reiterate, I wasn't there, so I can't --</p> <p>2 you know, this is all -- I don't know if it's hearsay</p> <p>3 or whatever the legal term for it is, but I'm trying</p> <p>4 to give you what I recall from seeing from this memo.</p> <p>5 Okay?</p> <p>6 Q. Yeah. Is there -- so I have one, two,</p> <p>7 three, four, five, six, seven other reasons other</p> <p>8 than these women's allegations that led to the</p> <p>9 meeting in -- in November 5th, 2018.</p> <p>10 A. You're saying that those allegations</p> <p>11 led to the meeting; what I'm saying is is that to</p> <p>12 this day I have never had the opportunity to directly</p> <p>13 address those allegations to those women. I mean, I</p> <p>14 guess I see -- I see Ms. Barbounis is on this call</p> <p>15 right now, so this is actually probably the first</p> <p>16 time that I've ever commented on this, at least one</p> <p>17 on one to a public forum that's of a nonlegal venue,</p> <p>18 but -- I guess it is a legal venue, right, though --</p> <p>19 because you're the -- you're the attorney who is</p> <p>20 deposing me today, but, again, these issues were a</p> <p>21 milieu -- there's also some characterizations of what</p> <p>22 Mr. Pipes --</p> <p>23 Q. Well, wait, let me just back you up.</p> <p>24 A. Sure.</p> <p>25 Q. Did Mr. Pipes ever talk to you about</p>



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<p>1 the allegations that these women made? Did he ever 2 sit down and have a conversation with you about it? 3 A. He had a conversation that I think he 4 observed that was with counsel, yes. 5 Q. So I'm not talking about -- I'm not 6 talking about, you know, litigation strategy 7 sessions. I'm talking about -- 8 A. I'm not talking about litigation. I'm 9 not talking about litigation. I'm saying -- 10 Q. What I'm trying to ask you about is -- 11 A. Sure. 12 Q. -- did Daniel Pipes ever sit down with 13 you and just have a conversation with you about these 14 allegations and what are we going to do about it type 15 of thing? 16 A. Which allegations, the one I just 17 enumerated or other allegations? 18 Q. The allegations that Patricia McNulty, 19 Marnie Meyer, and Lisa Barbounis made in November of 20 2018. 21 A. You have to be specific about the 22 allegations because I can't offer a answer in 23 totality unless you specifically get to the 24 allegations that you're talking about. 25 Q. That's fine.</p>	<p>1 Q. What is your general understanding -- 2 A. I was about to answer your general 3 question. Of a general question, she was unhappy at 4 the Middle East Forum. 5 Q. Well, did she make any specific 6 allegations regarding you? 7 A. She's never made an allegation to me, 8 no. 9 Q. About you. 10 A. She has, and those I believe are 11 memorialized in a document that I saw after this 12 litigation began that I think was sent in November of 13 2018 but you would have to be able to bring a 14 document forward for me to accurately comment on. 15 Q. Well, I'm asking you what's your 16 understanding of the allegations that she made 17 regarding you. 18 A. Again, there was I believe more than 19 one allegation, so you would have to be specific 20 showing me what they are so that I could give you the 21 best answer with all of my honesty and truthfulness 22 regarding the specific nature of what it is that 23 you're trying to get me to comment on. 24 Q. Well, I want you to tell me everything 25 that you think she said about you when she made</p>
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<p>1 MR. CARSON: Can we -- do you guys 2 mind if we do like a little -- I need -- 3 I have like a lump in my throat that's 4 going crazy. I need to get like a cough 5 drop and go to the bathroom. Do you 6 guys mind if we do a ten-minute break? 7 THE VIDEO SPECIALIST: We are now 8 off the record, it's -- 9 THE WITNESS: Sure. 10 THE VIDEO SPECIALIST: -- 12:47 11 p.m. 12 (A brief recess was taken.) 13 THE VIDEO SPECIALIST: We are now 14 on the record. It is 1:02 p.m. Eastern. 15 BY MR. CARSON: 16 Q. Mr. Roman, what are your -- what's your 17 understanding of the allegations that Patricia 18 McNulty made against you in November of 2018? 19 A. The understanding of which allegations? 20 Q. Any of them. What's your understanding 21 of what she said about you in November of 2018? 22 A. Well, you would have to be able to go 23 over the factual predicate for each allegation in 24 order for me to comment on it I think. Of a general 25 nature --</p>	<p>1 allegations regarding you in November of 2018. 2 A. Everything that you want me to think 3 about, there is many things. For instance -- 4 Q. Everything that you know, everything 5 that you remember, everything that you were told, 6 any -- 7 A. It's -- first of all, there's -- 8 Q. -- based on any knowledge that you 9 have. 10 A. -- there is many things that I remember 11 about Tricia McNulty. There is many things that I -- 12 Q. Mr. Roman, I'm going to stop you. I'm 13 not asking you to tell me everything that you 14 remember about Patricia McNulty. Do you understand 15 -- 16 MR. GOLD: Objection. That 17 question is way too broad. If you 18 narrow it, we'll let him answer it. 19 Everything he knows -- it's just 20 outrageous. He's not going to answer 21 that question. 22 MR. CARSON: Sidney, you're not 23 even objecting to the question. 24 MR. GOLD: I am objecting to it. 25 It's a ridiculous question.</p>

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<p>1 MR. CARSON: There wasn't a 2 question. 3 MR. GOLD: And from what -- 4 MR. CARSON: There wasn't a 5 question. 6 MR. GOLD: How about -- 7 MR. CARSON: You're objecting to 8 nothing right now. 9 THE COURT REPORTER: I can't hear 10 -- excuse me. I can't hear each of you 11 when you're both talking at the same 12 time. 13 MR. GOLD: I'm going to object. 14 The question lacks any modicum of 15 specificity with regard to -- 16 MR. CARSON: No one asked the 17 question you're objecting to. 18 MR. GOLD: Yes, you did. You 19 asked a question and I'm directing him 20 not to answer until you rephrase it. 21 MR. CARSON: Mr. Gold, you're 22 objecting to something that no one 23 asked. I didn't ask him tell me 24 everything you remember about Patricia 25 McNulty --</p>	<p>1 1st or around November 1st, 2018. Okay? 2 A. Well, there was -- you know, I've 3 become aware after this litigation started of many 4 things that she said both on and around November 1st 5 of 2018. There is something like 17,000 messages 6 that exist between -- that's maybe not an accurate 7 number, might be 16,000 -- 8 Q. Not asking you about messages. 9 A. -- might be 18,000 -- I'm trying to 10 give you comment here to the best of my ability. 11 Q. My question is who -- your 12 understanding who she made those allegations to, who 13 did she report that to. 14 A. Which allegations are you speaking 15 about, Mr. Carson? I have -- 16 Q. Any. 17 A. -- yet to see a document. 18 Q. Any of them. 19 A. Any of which allegations? 20 Q. Well, how many -- 21 A. For instance, I'll give you an 22 allegation that she -- 23 Q. Please stop. 24 A. Sure. 25 Q. We're going to do this clean. Okay?</p>
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<p>1 (Simultaneous speakers.) 2 MR. CARSON: What I said was I'm 3 not asking you about everything you said 4 about Patricia McNulty. So just listen, 5 please. 6 BY MR. CARSON: 7 Q. Anyway, what I'm asking you 8 specifically is do you recall that around November 9 1st, 2018, Ms. McNulty made allegations about you, 10 she reported something to Daniel Pipes about you, do 11 you recall that? 12 A. No. 13 Q. You don't recall that. 14 A. No, she never made allegations to me. 15 She made them to someone else. I can't comment on 16 something -- 17 Q. Right. 18 A. -- she said to someone else. I wasn't 19 there to comment on it. 20 Q. I'm not -- I'm asking you what's your 21 understanding of -- who do you think she made the 22 allegations to? 23 A. Made which allegations, Mr. Carson? 24 Q. Any. Who did she make them to. We're 25 talking about the allegations she made on November</p>	<p>1 A. Let's do it clean. 2 Q. So around November 1st, 2018, do you 3 understand that Ms. McNulty reported certain conduct 4 related to you to Mr. Pipes? 5 A. I understand that -- actually did -- do 6 I understand if Ms. McNulty -- 7 Q. It's a yes or no question. 8 A. -- reported -- hold on. I'm trying to 9 frame it here so that I can give you the best answer 10 to the best of my ability, Mr. Carson. Do I 11 understand that around November 1st of 2018 Tricia 12 McNulty made allegations to Daniel Pipes about my 13 conduct. You got to be more specific, in what 14 capacity. Because there is a few things that she 15 said that I can give you the answer here to. 16 Q. Give me the first thing that you 17 remember. 18 A. The first thing that I remember is a 19 text message that Tricia McNulty sent to Lisa 20 Barbounis saying what's your Gregg plan. That's one 21 thing I remember about her concocting allegations 22 about me that she said to Lisa Barbounis that I think 23 she then delivered to Lisa Barbounis -- to Lisa 24 Barbounis and -- 25 Q. Well, when did you see --</p>

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<p>1 A. -- Daniel Pipes.</p> <p>2 Q. -- that message?</p> <p>3 A. That was in the two hundred thousand</p> <p>4 plus messages that you handed over to the Middle East</p> <p>5 Forum on August 16th, 2020.</p> <p>6 Q. Okay. So I'm -- I'm not talking about</p> <p>7 what you saw on discovery.</p> <p>8 A. So that's why I need you to be</p> <p>9 specific. You got to tell me what you're talking</p> <p>10 about.</p> <p>11 Q. I am being specific. My question is</p> <p>12 did Daniel Pipes ever notify you that there was</p> <p>13 allegations made against you.</p> <p>14 A. Did Daniel Pipes ever notify me that</p> <p>15 there were allegations made against me. We talked</p> <p>16 about the managerial allegations beforehand, so I</p> <p>17 think my record stand -- I think my answer stands on</p> <p>18 the record about what I recall --</p> <p>19 Q. Talking about the allegations of</p> <p>20 Patricia McNulty.</p> <p>21 A. What allegations --</p> <p>22 Q. It's a yes or no --</p> <p>23 A. -- Mr. Carson?</p> <p>24 Q. Did Daniel Pipes ever tell you that she</p> <p>25 made allegations in November -- around November 1st,</p>	<p>1 stories over the last two years and I'm trying to</p> <p>2 figure out what story are you trying to refer to.</p> <p>3 Q. I'm asking you -- so you just said</p> <p>4 Daniel Pipes sent you an e-mail about these</p> <p>5 allegations, correct?</p> <p>6 A. The e-mail that you sent me a draft of</p> <p>7 whether or not that was the specific e-mail that I</p> <p>8 got, but you have to be able to show me the documents</p> <p>9 for me to comment on it.</p> <p>10 Q. No, I'm asking you a question,</p> <p>11 Mr. Roman, about -- you said that Daniel Pipes sent</p> <p>12 you an e-mail where he notified you that certain</p> <p>13 allegations were being made.</p> <p>14 A. Right, that's -- I think you just</p> <p>15 showed me a draft of an e-mail that I received.</p> <p>16 Q. Well, there was nothing about</p> <p>17 allegations in that draft.</p> <p>18 A. There definitely was, that said, in</p> <p>19 parentheses, if you go back to it, if we can refer to</p> <p>20 that document -- can we refer to Roman 1 as the</p> <p>21 exhibit so I can give a comment on it for a second?</p> <p>22 Go up to the first paragraph. Interim</p> <p>23 because the office and I are reeling from the sudden</p> <p>24 changes this month. That seems like there has to be</p> <p>25 a predicate for changing this job and that looks like</p>
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<p>1 2018?</p> <p>2 A. Mr. Pipes --</p> <p>3 Q. Did she ever tell you that?</p> <p>4 A. Mr. Pipes --</p> <p>5 Q. Did he ever tell you that?</p> <p>6 A. -- wrote me an e-mail that said certain</p> <p>7 individuals have said certain things about you and</p> <p>8 those certain things have led me to conclude that you</p> <p>9 are no longer in a position to handle the</p> <p>10 administration of the Middle East Forum anymore. In</p> <p>11 terms of what Ms. McNulty said, I don't have a record</p> <p>12 of a specific allegation made to me on November 1st,</p> <p>13 2018, because this is information I became aware of</p> <p>14 in its totality after you filed -- not you, excuse</p> <p>15 me, that's incorrect. -- after your clients filed an</p> <p>16 Equal Employment Opportunity Commission complaint</p> <p>17 against me --</p> <p>18 Q. Okay. But we're not talking about --</p> <p>19 A. No, but I'm saying, because this is the</p> <p>20 thing, right? You're saying which allegations,</p> <p>21 right? There is actually, from what I understand, at</p> <p>22 least five different versions of allegations that may</p> <p>23 be of the same nature around the same alleged series</p> <p>24 of events which are of all different natures. That's</p> <p>25 why it's so confusing. You've told five different</p>	<p>1 that could be something dealing with changes in the</p> <p>2 office, and I took that to be that there was a change</p> <p>3 that took place. Now, I know -- I know that there is</p> <p>4 another e-mail --</p> <p>5 Q. Is there anything about Ms. McNulty's</p> <p>6 allegations in this document?</p> <p>7 A. No, but I think that what he's</p> <p>8 referring to is a second e-mail --</p> <p>9 Q. I wasn't asking you what he's referring</p> <p>10 to. So -- there is not. So my question --</p> <p>11 A. I think there is, though. I think</p> <p>12 there is.</p> <p>13 Q. Where? Show me where they're talking</p> <p>14 about --</p> <p>15 A. When he says "are reeling from the</p> <p>16 sudden changes." Okay? So when he's --</p> <p>17 Q. You're --</p> <p>18 A. -- talking about sudden changes -- this</p> <p>19 is just my interpretation --</p> <p>20 Q. Let me get a question out and then you</p> <p>21 answer the question. Okay?</p> <p>22 A. Sure.</p> <p>23 Q. So is it your testimony that that</p> <p>24 phrase in this document is referring to Ms. McNulty's</p> <p>25 allegations?</p>

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<p>1 A. No, it's not, not at all. What it is</p> <p>2 is is that the --</p> <p>3 Q. But my --</p> <p>4 A. -- sudden changes refer to the totality</p> <p>5 of what he said was --</p> <p>6 Q. Mr. Roman, I'm --</p> <p>7 A. -- change that took place in the</p> <p>8 office.</p> <p>9 Q. You got to just let me get my questions</p> <p>10 in. You got to --</p> <p>11 A. Well, you asked me a question. You</p> <p>12 said is it your testimony that this refers --</p> <p>13 Q. Right.</p> <p>14 A. -- to Tricia McNulty's allegations --</p> <p>15 Q. You said no.</p> <p>16 A. -- in quotation marks --</p> <p>17 Q. You answered the question.</p> <p>18 A. -- and -- I didn't say no. I said no I</p> <p>19 think that it refers to the totality of what</p> <p>20 Mr. Pipes described as sudden changes in the office</p> <p>21 that may or may not have included these whatever</p> <p>22 allegations that you haven't specified include.</p> <p>23 Q. Okay. Is there another e-mail that</p> <p>24 Mr. Pipes sent you where he referred to Ms. McNulty's</p> <p>25 allegations?</p>	<p>1 possible --</p> <p>2 Q. You got to stop talking over me.</p> <p>3 A. -- so the record reflects what</p> <p>4 happened.</p> <p>5 Q. All right? You got to stop talking</p> <p>6 over me. My question is simple. Sitting here today</p> <p>7 do you ever recall an e-mail that you were ever sent</p> <p>8 by Mr. Pipes specifically about Ms. McNulty's</p> <p>9 allegations?</p> <p>10 A. Which allegations are you talking</p> <p>11 about, Mr. Carson?</p> <p>12 Q. Allegations she made November 1st,</p> <p>13 2018, or around that --</p> <p>14 A. You got to be specific. I just told</p> <p>15 you one allegation where she said --</p> <p>16 Q. Do you recall any e-mail about her</p> <p>17 allegations, yes or no?</p> <p>18 A. Which --</p> <p>19 Q. If you don't -- or I don't know.</p> <p>20 A. Mr. Carson --</p> <p>21 Q. Yes, no, I don't know.</p> <p>22 A. -- the factual -- the factual predicate</p> <p>23 of the question that you're asking is not specific</p> <p>24 enough to allow me to comment.</p> <p>25 MR. CARSON: All right. We're</p>
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<p>1 A. I don't know if he's referring to Ms.</p> <p>2 McNulty, but I did get another e-mail from Mr. Pipes.</p> <p>3 Q. Did you ever get an e-mail from</p> <p>4 Mr. Pipes specifically about Ms. McNulty's</p> <p>5 allegations?</p> <p>6 A. I don't know. You would have to give</p> <p>7 me the opportunity to read through all the discovery</p> <p>8 that we handed over to you. I think we gave you like</p> <p>9 five or six thousand documents. So if you in</p> <p>10 preparation --</p> <p>11 Q. Sitting here today.</p> <p>12 A. -- for today's deposition be able to</p> <p>13 provide me that --</p> <p>14 Q. Mr. Roman --</p> <p>15 A. -- I could probably comment on it.</p> <p>16 Q. You can just say I don't know and then</p> <p>17 we can move on --</p> <p>18 A. Well, Mr. Carson, I believe that as the</p> <p>19 deponent in today's deposition I'm trying to provide</p> <p>20 you the best recollection of my knowledge as it</p> <p>21 relates to the questions that you are offering</p> <p>22 today --</p> <p>23 Q. Okay. Thank you.</p> <p>24 A. -- and I would like to be able to do</p> <p>25 that in the most -- with the most efficacy as</p>	<p>1 going to stop and call the Court. Okay,</p> <p>2 guys? This is getting ridiculous, so --</p> <p>3 all right. Thank you.</p> <p>4 THE VIDEO SPECIALIST: We're off</p> <p>5 the record. It's 1:15 p.m. Eastern.</p> <p>6 MR. CAVALIER: I would defer to</p> <p>7 Mr. Gold in this respect, but if we're</p> <p>8 going to do a call to the Court I would</p> <p>9 at least like to have a discussion about</p> <p>10 whether it should be on the record.</p> <p>11 MR. CARSON: Well, I'm going to</p> <p>12 start calling right now. You guys can</p> <p>13 have that discussion if you want. I</p> <p>14 don't care.</p> <p>15 MR. CAVALIER: All right. Well,</p> <p>16 if nobody has any opinion on it, then I</p> <p>17 would ask that we stay on the record for</p> <p>18 this call.</p> <p>19 MR. GOLD: Correct.</p> <p>20 MR. CARSON: No. I have an</p> <p>21 opinion. We're not on the record.</p> <p>22 THE COURT REPORTER: Are we on the</p> <p>23 record or off the record, please?</p> <p>24 MR. CARSON: Off the record.</p> <p>25 We're not wasting time with this. This</p>



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<p>1 is ridiculous.</p> <p>2 MR. CAVALIER: I disagree. As far</p> <p>3 as I'm concerned, we have to remain on</p> <p>4 the record unless we all agree to go</p> <p>5 off.</p> <p>6 MR. CARSON: Well, you can't go on</p> <p>7 the record -- we're already off the</p> <p>8 record. You can't go on unless we agree</p> <p>9 to go on.</p> <p>10 MR. CAVALIER: I didn't agree to</p> <p>11 go off the record, Seth.</p> <p>12 MR. GOLD: We're not going off the</p> <p>13 record. Stay on the record.</p> <p>14 MR. CARSON: We are off the record</p> <p>15 right now.</p> <p>16 MR. CAVALIER: We're on the</p> <p>17 record.</p> <p>18 MR. CARSON: They already said off</p> <p>19 the record. No, we're not.</p> <p>20 MR. CAVALIER: You said off the</p> <p>21 record. I didn't say it, Sid didn't say</p> <p>22 it; you can't unilaterally go off the</p> <p>23 record.</p> <p>24 MR. CARSON: Well, we're not on</p> <p>25 the record right now. Sorry.</p>	<p>1 Patricia McNulty was making an allegation involving</p> <p>2 sexual harassment against you?</p> <p>3 A. Patricia McNulty. I would have to say</p> <p>4 without the specific day the beginning of November</p> <p>5 2018.</p> <p>6 Q. How did you find that out?</p> <p>7 A. It was communicated to me in an e-mail.</p> <p>8 Q. Was that e-mail from Daniel Pipes?</p> <p>9 A. I don't remember.</p> <p>10 Q. What did the e-mail say?</p> <p>11 A. There was a -- like I said beforehand,</p> <p>12 a general e-mail saying that these people have said</p> <p>13 that you have done something and then you have said</p> <p>14 that you did not do those things.</p> <p>15 Q. Right, but that's not when you first</p> <p>16 found out about it because the e-mail that you're</p> <p>17 referencing talked about your response, right?</p> <p>18 A. Right, but what I'm saying is is</p> <p>19 that there was an e-mail where I was told that there</p> <p>20 were issues that took place, I don't remember the</p> <p>21 specificity of the e-mail, I don't remember if it was</p> <p>22 conversation that took place beforehand -- this is</p> <p>23 something that's, what, like two years ago, three</p> <p>24 years ago -- so if you, you know, look at this --</p> <p>25 Q. Is this the e-mail you're talking</p>
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<p>1 THE VIDEO SPECIALIST: I called it</p> <p>2 off the record, gentlemen. I said we're</p> <p>3 off the record.</p> <p>4 MR. CAVALIER: Well, then when we</p> <p>5 get on the call with the Court, we're</p> <p>6 going to raise this issue.</p> <p>7 THE COURT REPORTER: I can't go</p> <p>8 off unless you all agree, so it's been</p> <p>9 on.</p> <p>10 MR. CAVALIER: Good, because we</p> <p>11 didn't all agree.</p> <p>12 (A call was placed to Judge Wolson.)</p> <p>13 (A discussion was held with Judge</p> <p>14 Wolson via speakerphone wherein</p> <p>15 it was agreed that the discussion</p> <p>16 would be off the record.)</p> <p>17 THE WITNESS: Could I take two</p> <p>18 minutes to use the restroom?</p> <p>19 MR. GOLD: Yeah, go ahead.</p> <p>20 THE WITNESS: Thank you.</p> <p>21 (A brief recess was taken.)</p> <p>22 THE VIDEO SPECIALIST: We're back</p> <p>23 on the record. It is 1:48 p.m. Eastern.</p> <p>24 BY MR. CARSON:</p> <p>25 Q. When did you first find out that</p>	<p>1 about?</p> <p>2 A. As you know, there have been several</p> <p>3 allegations -- let me read the whole e-mail first.</p> <p>4 Can you go down?</p> <p>5 Q. I believe that's it.</p> <p>6 A. Yes, as it relates to allegations of a</p> <p>7 nature as you describe regarding Patricia McNulty,</p> <p>8 there was a conversation with counsel that I believe</p> <p>9 I'm not supposed to talk about and then this is the</p> <p>10 first time I received a formal notice of those</p> <p>11 allegations in an e-mail from Daniel Pipes to me on</p> <p>12 what looks like here is Friday, November 2nd, at</p> <p>13 11:51 in the evening.</p> <p>14 Q. You received this e-mail on 11/2/18,</p> <p>15 correct?</p> <p>16 A. Well, it says Friday, November 2nd,</p> <p>17 2018, 11:51 p.m., that's UTC time, so that's, what,</p> <p>18 like four hours ahead of Eastern time, so it's</p> <p>19 probably 7, 8 p.m., something like that.</p> <p>20 Q. 7 or 8:00 on November 2nd?</p> <p>21 A. Yeah, in the evening. That's what the</p> <p>22 time stamp says.</p> <p>23 Q. Okay. So the e-mail says there have</p> <p>24 been several allegations of improper conduct directed</p> <p>25 against you. The Middle East Forum takes these</p>

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<p>1 allegations very seriously. Accordingly, I</p> <p>2 investigated this matter yesterday, immediately upon</p> <p>3 learning of it.</p> <p>4 Did Daniel Pipes talk to you yesterday,</p> <p>5 November 1st?</p> <p>6 A. Yesterday was November 19th, so you</p> <p>7 mean --</p> <p>8 Q. No, yesterday --</p> <p>9 A. -- do you mean he spoke to me --</p> <p>10 Q. I'm talking about --</p> <p>11 A. What do you mean?</p> <p>12 Q. -- yesterday -- when I say yesterday, I</p> <p>13 mean quote/unquote yesterday. Did he talk to you on</p> <p>14 November 1st, 2018?</p> <p>15 A. I don't remember.</p> <p>16 Q. You don't -- when do you remember</p> <p>17 talking to Daniel Pipes about this?</p> <p>18 A. I've spoken about him many times since</p> <p>19 this e-mail was received.</p> <p>20 Q. When is the first time you remember</p> <p>21 talking to him about this?</p> <p>22 A. I don't remember. It would probably be</p> <p>23 sometime around November 2nd, 2018. It's the first</p> <p>24 time I have an e-mail communication from him about</p> <p>25 it.</p>	<p>1 question.</p> <p>2 THE WITNESS: Sure. I've had many</p> <p>3 conversations with Mr. Pipes about the</p> <p>4 -- what I believe is where you're</p> <p>5 talking about, the several allegations</p> <p>6 of improper conduct that you mention</p> <p>7 here. We've had conversations about it</p> <p>8 in November of 2018, we've had</p> <p>9 conversations about it many times.</p> <p>10 BY MR. CARSON:</p> <p>11 Q. Not talking about that. We're talking</p> <p>12 about this letter here. So it says you maintain you</p> <p>13 never made such advances, so that -- you told</p> <p>14 Mr. Pipes that?</p> <p>15 A. I have maintained since the start of</p> <p>16 this entire process that I have not -- what's the</p> <p>17 best way to put it that will answer this the best</p> <p>18 way.</p> <p>19 Q. My question is --</p> <p>20 A. I'm telling -- I'm giving you my</p> <p>21 answer, Mr. Carson.</p> <p>22 Q. It's did you tell Mr. Pipes that. That</p> <p>23 was my question.</p> <p>24 A. I have told Mr. Pipes on many occasions</p> <p>25 and I have told other individuals on many occasions</p>
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<p>1 Q. Well, it says that you maintain you</p> <p>2 never made such advances, so who did you maintain</p> <p>3 that to?</p> <p>4 A. I believe that anything that I would</p> <p>5 have said would have been in the process of an</p> <p>6 investigation with counsel. Now, I'm going to ask my</p> <p>7 attorney for a legal opinion whether or not I should</p> <p>8 answer that.</p> <p>9 Q. It's not privileged. It's in this</p> <p>10 letter.</p> <p>11 A. I'm not asking you, Mr. Carson. I'm</p> <p>12 asking my counsel.</p> <p>13 THE WITNESS: Counsel --</p> <p>14 MR. GOLD: Can you please read the</p> <p>15 question back?</p> <p>16 BY MR. CARSON:</p> <p>17 Q. Who did you maintain that you never</p> <p>18 made such advances to? Who did you tell that to?</p> <p>19 You told that to Mr. Pipes?</p> <p>20 THE WITNESS: Counsel, can I</p> <p>21 answer this? Can I comment --</p> <p>22 I'm seeking a legal opinion,</p> <p>23 Mr. Carson.</p> <p>24 MR. GOLD: He asked you what you</p> <p>25 told Mr. Pipes. You can answer the</p>	<p>1 the same answer that I give to you now. I did --</p> <p>2 Q. I'm not asking you -- I'm not asking</p> <p>3 you --</p> <p>4 A. I'm telling you -- I'm telling you what</p> <p>5 I told Mr. Pipes.</p> <p>6 Q. No, your -- your answer is</p> <p>7 nonresponsive right now. I'm asking you about --</p> <p>8 A. Mr. Carson, please let me make the</p> <p>9 answer and I can give --</p> <p>10 Q. No.</p> <p>11 A. -- you an answer.</p> <p>12 Q. No, no. I'm asking you specifically,</p> <p>13 when Mr. Pipes writes to you that you maintain you</p> <p>14 never made such advances, that's something you told</p> <p>15 him? Yes or no.</p> <p>16 A. I have told --</p> <p>17 Q. Yes or no.</p> <p>18 A. I have --</p> <p>19 Q. Is that something you told Mr. Pipes?</p> <p>20 A. Mr. Carson, if you'll let me please</p> <p>21 answer, I would like to be able to give the answer to</p> <p>22 you.</p> <p>23 Q. You got to start with yes or no then.</p> <p>24 A. Please don't instruct me on how to give</p> <p>25 my answer.</p>



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<p>1 (Simultaneous speakers.)</p> <p>2 THE COURT REPORTER: I can't hear</p> <p>3 anybody when you're all talking at the</p> <p>4 same time.</p> <p>5 MR. GOLD: Mr. Carson, ask the</p> <p>6 question, let him answer; if you're not</p> <p>7 happy with the question, then, you know,</p> <p>8 rephrase it or do whatever you need to</p> <p>9 do, but no argument, please, wasting</p> <p>10 time.</p> <p>11 BY MR. CARSON:</p> <p>12 Q. Mr. Roman, my question is about this</p> <p>13 sentence here. Is this something that you told</p> <p>14 Mr. Pipes, yes or no.</p> <p>15 A. Again, Mr. Carson --</p> <p>16 Q. I'm not asking you about every time you</p> <p>17 told him. I know. You told him a lot of times you</p> <p>18 didn't do it. I get it. But I'm asking you --</p> <p>19 A. I'm trying to get an answer out.</p> <p>20 Q. -- about this letter.</p> <p>21 A. I'm trying to get an answer out.</p> <p>22 You're interrupting me every time I give an answer.</p> <p>23 Q. All right. I'll rephrase the question.</p> <p>24 When Mr. Pipes says you maintain you never made such</p> <p>25 advances, when did you maintain that? When did you</p>	<p>1 Q. I'm not asking about Mr. Fink.</p> <p>2 A. -- the -- Mr. Carson --</p> <p>3 Q. I'm not -- I said is that something you</p> <p>4 had --</p> <p>5 A. Mr. Carson --</p> <p>6 Q. -- you talked to Mr. Pipes about.</p> <p>7 A. -- I'm trying to give you an answer.</p> <p>8 Q. I know. It's a yes or no question,</p> <p>9 though. Is that something you talked to Mr. Pipes</p> <p>10 about.</p> <p>11 A. Mr. Carson, I do not recall if</p> <p>12 Mr. Pipes is the individual that I gave these answers</p> <p>13 to. What I'm trying to tell you is that I</p> <p>14 participated in an extensive interview with counsel</p> <p>15 about these allegations --</p> <p>16 Q. When?</p> <p>17 A. -- and -- before, when they were made.</p> <p>18 I think --</p> <p>19 Q. When --</p> <p>20 A. -- that I had -- I think that I had --</p> <p>21 Q. Well, when did you have this</p> <p>22 conversation?</p> <p>23 A. -- a -- I think that I had a</p> <p>24 conversation with Mr. Fink sometime between October</p> <p>25 31st and the writing of this e-mail, so within that</p>
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<p>1 tell him that?</p> <p>2 A. Well, you're again asking that question</p> <p>3 that relies on a factual predicate that may or not be</p> <p>4 true because I don't remember it. What I'm trying to</p> <p>5 tell you is --</p> <p>6 Q. It might not be true --</p> <p>7 A. I'm --</p> <p>8 Q. It might not be true that you didn't</p> <p>9 tell him that?</p> <p>10 A. I may have said to counsel something</p> <p>11 that I don't know whether or not I'm allowed to do,</p> <p>12 but in general, Mr. Carson, I have always maintained</p> <p>13 to Mr. Pipes and to anyone else that all of these</p> <p>14 allegations are untrue.</p> <p>15 Q. It says -- the next thing it says is</p> <p>16 and that you -- and -- you maintain you never made</p> <p>17 such advances and did not know they felt</p> <p>18 uncomfortable. But you acknowledge that your</p> <p>19 conduct, whatever your intentions were, were not</p> <p>20 acceptable and put these employees in a difficult</p> <p>21 position.</p> <p>22 So that's something you had a</p> <p>23 conversation with Mr. Pipes about, correct?</p> <p>24 A. No, Mr. Carson, Mr. Fink</p> <p>25 investigated --</p>	<p>1 48-hour period there was an investigation that was</p> <p>2 launched by in-house counsel and to these allegations</p> <p>3 as per the policy of the Middle East Forum and I</p> <p>4 believe that the results of that investigation was</p> <p>5 conveyed to Mr. Pipes. That's my answer.</p> <p>6 Q. So Mr. Pipes wasn't there when you said</p> <p>7 that you acknowledge your intentions were not</p> <p>8 acceptable and put these employees in a difficult</p> <p>9 position.</p> <p>10 A. I don't know because I was speaking to</p> <p>11 Marc Fink --</p> <p>12 Q. Was Mr. Pipes present?</p> <p>13 A. -- okay -- I know that there was a</p> <p>14 conversation with Marc Fink about this entire</p> <p>15 litany --</p> <p>16 Q. Okay.</p> <p>17 A. -- of what came forward. Now, whether</p> <p>18 Mr. Pipes --</p> <p>19 Q. I understand. I understand.</p> <p>20 A. Now, whether Mr. Pipes was present</p> <p>21 there or not, I don't know.</p> <p>22 Q. Okay. Did you ever have a conversation</p> <p>23 with Mr. Pipes where you made comments like this,</p> <p>24 where you said that you acknowledge that your</p> <p>25 intentions -- you acknowledge your conduct, whatever</p>

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<p>1 your intentions were, were not acceptable and put 2 these employees in a difficult position, did you ever 3 have a conversation with Mr. Pipes where you said 4 that?</p> <p>5 A. We have to break it down. First of 6 all, about Mr. Pipes, I, again, don't know if he was 7 there or not. I did speak with in-house counsel. 8 Second, as it relates to conduct, which conduct are 9 we talking about?</p> <p>10 Q. Well, which conduct were you talking 11 about when you said that?</p> <p>12 A. Well, I don't know if I said this -- 13 what I'm saying is is that the conduct you're 14 trying to get me to refer to in general was my 15 managerial style that I think, and I'll try to offer 16 you a little positive matter now so we get this 17 moving a little bit forward, was one in which blended 18 professional and personal relationships, personal of 19 a friendly nature, not one of a sexual nature, 20 Mr. Carson.</p> <p>21 Q. So when you --</p> <p>22 A. So the mistake -- if I can finish. So 23 the mistake that I may be referring to in any conduct 24 that allegedly took place prior to November 2nd, 25 2018, 11:51 p.m., was one in which I thought that the</p>	<p>1 A. I don't remember.</p> <p>2 Q. Well, how many conversations did you 3 have with him back in 2018?</p> <p>4 A. I have had probably thousands of 5 conversations with Mr. Pipes in 2018.</p> <p>6 Q. No, I didn't ask you how many 7 conversations you had with Mr. Pipes in 2018. I 8 asked you how many conversations have you had with 9 Mr. Pipes about Patricia McNulty's allegations of 10 sexual harassment in 2018.</p> <p>11 A. I don't recall.</p> <p>12 Q. Was it more than one?</p> <p>13 A. I don't recall.</p> <p>14 Q. Could it be zero?</p> <p>15 A. No.</p> <p>16 Q. So it's at least one.</p> <p>17 A. Yes.</p> <p>18 Q. Is it at least five?</p> <p>19 A. Well, again, you have to be specific 20 about the allegations. I'll give you an example.</p> <p>21 Q. Sexual harassment allegations.</p> <p>22 A. We -- no, about --</p> <p>23 Q. I don't need an example. I'm --</p> <p>24 A. Okay. Mr. Carson, you're asking me to 25 be as specific as possible.</p>
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<p>1 people I worked with were my friends rather than just 2 subordinates or employees. That would take the 3 conduct of going to birthday parties, it would be 4 going out to events like seeing movies, it would 5 be --</p> <p>6 Q. Going to Israel?</p> <p>7 A. -- going -- in terms of going -- 8 listen, to -- if you want to finish my answer, I'm 9 trying to give you a little bit of explanation here.</p> <p>10 Q. Would it include going to Israel?</p> <p>11 A. No, not at all. Israel and any trips 12 that would be overseas were of a purely professional 13 nature.</p> <p>14 Q. Okay. So my question is, have you ever 15 had a conversation with Mr. Pipes about Ms. McNulty's 16 allegations of sexual harassment?</p> <p>17 A. Yes.</p> <p>18 Q. When?</p> <p>19 A. I've had many conversations with him 20 since she made those allegations.</p> <p>21 Q. Okay. So let me be more specific. Did 22 you ever have a conversation in 2018 with Mr. Pipes 23 about Ms. McNulty's allegations of sexual harassment?</p> <p>24 A. Yes.</p> <p>25 Q. When?</p>	<p>1 Q. I know, I don't need you to give me --</p> <p>2 A. I'm trying to be as specific as 3 possible.</p> <p>4 Q. Okay. So just listen to my question 5 and answer the question I'm asking you.</p> <p>6 A. Okay.</p> <p>7 Q. Okay? How many times did you talk to 8 Mr. Pipes -- and I know you've already answered that 9 you think it's -- it's at least one. My question is, 10 do you think it's at least five times that you've 11 talked to Mr. Pipes about sexual harassment 12 allegations from Ms. McNulty in 2018? Is it like 13 five times?</p> <p>14 A. I don't know if it's five.</p> <p>15 Q. So is it fair to say it's probably 16 between one and five? Can we put it --</p> <p>17 A. No, it's not fair to say because I 18 can't give you the exact number, but if you would 19 like me to tell you what I think I spoke to him 20 about --</p> <p>21 Q. Yeah, let me ask the question then. So 22 --</p> <p>23 A. Sure.</p> <p>24 Q. -- the one time that -- the at least 25 one time that you can recall, can you describe where</p>

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<p>1 -- can you say where you were when you had that conversation?</p> <p>2 A. No, it's of a general nature.</p> <p>3 Q. Well, do you know -- were you in the Middle East Forum office? Was it over the phone? Do you know that?</p> <p>4 A. No, I have not been in the Middle East Forum office at least between November -- was it even beforehand because I was in Los Angeles when many of these things were taking place, I wasn't even in Philadelphia until that weekend.</p> <p>5 Q. So it was probably over the phone; is that fair to say?</p> <p>6 A. Yeah. I have not been in the Middle East Forum office. I was not in the Middle East Forum office during this entire time, maybe one time to film a video and I was at Lisa Barbounis's initiation.</p> <p>7 Q. When you say this entire time, what do you mean? From when to when?</p> <p>8 A. Between the time that these allegations were made until now. I mean, I think I've been there probably twice.</p> <p>9 Q. Okay. So it's fair to say that the at least one conversation you had with Mr. Pipes was</p>	<p>1 Q. We're looking at that e-mail right now.</p> <p>2 A. I know, I'm saying this, I'm saying they say you made unwanted sexual advances toward them.</p> <p>3 Q. Okay.</p> <p>4 A. That's the conversation with Pipes. He's saying these people made allegations against you, they said you made advances towards them, and my response was no I didn't.</p> <p>5 Q. Okay. Did Mr. Pipes ever call you again and get more specific with the allegations?</p> <p>6 A. Everything that I've been having with this was through counsel. Now, as it relates to the conversations that I had with Mr. Pipes, he would say quite often to me, and this is why I can't tell you if it was McNulty or if it was somebody else, Gregg, you're in this position because you were not a good manager, and then subsequent positions took place not about sexual harassment but in the way in which he thought that I was too stern of a boss as it related to the people who were under me until November 1st, two -- or November 2nd here, 2018, when all managerial authorities were removed from my remit as director of the organization.</p> <p>7 Q. Everything we're talking about right</p>
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<p>1 over the telephone.</p> <p>2 A. Yeah, probably, and there was actually probably ten weeks between this taking place and January of 2019 where I didn't even see him. I was completely removed from the office.</p> <p>3 Q. So we're just talking about conversations with Daniel Pipes in connection with Patricia McNulty's allegations of sexual harassment.</p> <p>4 A. Right. But, again, Mr. Carson, there has to be specificity regarding these allegations because there are five different versions from my account --</p> <p>5 Q. But there weren't five versions --</p> <p>6 A. -- of what these accusations --</p> <p>7 Q. Were there five versions in 2018?</p> <p>8 A. There was multiple versions, yes.</p> <p>9 Q. All right. What are the versions you remember there being in 2018?</p> <p>10 A. Well, I don't remember the specific versions. I remember --</p> <p>11 Q. Well, how do you know --</p> <p>12 A. -- that there was an e-mail that I received which said that Lisa Barbounis, Tricia McNulty, and Marnie -- this is the words here, says they say --</p>	<p>1 now, though, has to do with allegations that Patricia McNulty -- you asked for specificity. This is what --</p> <p>2 A. Yeah, I'm saying the specific allegations.</p> <p>3 Q. Mr. Roman, wait for the question. Just wait for the question.</p> <p>4 A. Sure.</p> <p>5 Q. Everything that we're doing right now, everything we're talking about right now, all the questions I'm asking you right now, are regarding Patricia McNulty's allegations of sexual harassment that occurred in 2018, and every conversation I'm asking you about right now I'm asking you to limit it to 2018, so we're only talking about that window from about November 1st, 2018, to December 31st, 2018. That's all -- all right? So I haven't even asked a question, but I'm just -- that's what I'm asking --</p> <p>6 A. Yeah.</p> <p>7 Q. All right.</p> <p>8 A. Frankly --</p> <p>9 Q. So my question is --</p> <p>10 A. Frankly, the specificity of what, Mr. Carson, you're --</p> <p>11 Q. All I've done is explain the time line</p>

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<p>1 and the subject so I haven't asked a question.</p> <p>2 A. Okay. But I'm trying -- I thought you</p> <p>3 asked a question right there.</p> <p>4 Q. I haven't.</p> <p>5 A. You said -- I thought you said you want</p> <p>6 to ask about 2018, so --</p> <p>7 Q. I haven't asked anything yet.</p> <p>8 A. -- I was trying to clarify what you</p> <p>9 said.</p> <p>10 Q. I have not asked a question yet.</p> <p>11 A. Okay. Go ahead.</p> <p>12 Q. Just wait for the question. All right.</p> <p>13 The question is, during that time frame and related</p> <p>14 to that one person, Patricia McNulty, and allegations</p> <p>15 of sexual harassment, the conversation that you</p> <p>16 recall having with Daniel Pipes --</p> <p>17 A. Correct.</p> <p>18 Q. -- is it your testimony that it only</p> <p>19 related to what's said in this letter?</p> <p>20 A. My testimony is is that any</p> <p>21 conversations that I ever had with Daniel Pipes in</p> <p>22 2018 between November 2nd and December 31st regarding</p> <p>23 allegations that Tricia McNulty may have made were of</p> <p>24 a general nature where he said, Mr. Roman, the</p> <p>25 results of the investigation that was carried out by</p>	<p>1 A. I don't --</p> <p>2 Q. Did you ever say this is what happened.</p> <p>3 A. I don't think I did that, no.</p> <p>4 Q. All right. So you -- do you understand</p> <p>5 that Ms. McNulty's allegations, one of them, relates</p> <p>6 to something that happened at the AIPAC conference?</p> <p>7 A. I understand that it's something that</p> <p>8 allegedly happened at the AIPAC conference, not</p> <p>9 something that happened. Please be specific.</p> <p>10 Q. Well, I think I'm being specific when I</p> <p>11 say that the allegation relates to something that</p> <p>12 happened -- I'm saying it's an allegation --</p> <p>13 A. You're saying something happened at</p> <p>14 AIPAC. I'm saying something didn't happen at AIPAC.</p> <p>15 Q. Mr. Roman, I can say allegation twice</p> <p>16 in the same sentence if it helps you.</p> <p>17 A. Sure. Go ahead.</p> <p>18 Q. The allegation relates to an allegation</p> <p>19 at the AIPAC conference. Okay? So when did you find</p> <p>20 that out -- when did you find that out?</p> <p>21 A. Regarding specific allegations about</p> <p>22 what happened specifically at AIPAC, is that what</p> <p>23 you're asking about?</p> <p>24 Q. I'm asking for a date. What is the</p> <p>25 date or the approximate date that you learned that</p>
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<p>1 in-house counsel are of the following. You have been</p> <p>2 accused by Ms. McNulty, and only limiting it to that</p> <p>3 because that's the scope of the questions that you</p> <p>4 want to ask, of unwanted sexual advances, you</p> <p>5 maintain that you did not, and I still maintain to</p> <p>6 this day that I did not, make any advances towards</p> <p>7 Tricia McNulty of any nature, and he would say to me</p> <p>8 we have to do the following actions. He was speaking</p> <p>9 to me about the results of his investigation which he</p> <p>10 still maintains to this day were inconclusive and he</p> <p>11 took action because it was mitigating risk with the</p> <p>12 organization rather than following up on the veracity</p> <p>13 that we now know today is untrue of what she said.</p> <p>14 So that's the content of my conversations with Mr.</p> <p>15 Pipes about Ms. McNulty's accusations here of the</p> <p>16 specific nature you'll have to ask if you would like</p> <p>17 me to comment specifically.</p> <p>18 Q. Did he ever -- did Daniel Pipes ever</p> <p>19 ask you to provide a statement about what happened in</p> <p>20 connection with Ms. McNulty's allegations?</p> <p>21 A. Any statements that I made were made to</p> <p>22 counsel.</p> <p>23 Q. Did you ever write down what happened</p> <p>24 on a piece of paper? I'm not asking you to tell me</p> <p>25 what you wrote; I'm asking whether you wrote it down.</p>	<p>1 Ms. McNulty's allegations related to an allegation of</p> <p>2 something that happened at the AIPAC conference?</p> <p>3 A. I would probably say November 1st or</p> <p>4 November 2nd, whenever I spoke with counsel.</p> <p>5 Q. So you're telling me you found that out</p> <p>6 through information you got from counsel.</p> <p>7 A. Anything I found out about allegations</p> <p>8 of any nature regarding a sexual nature that were</p> <p>9 made against me as it relates to the people here,</p> <p>10 Lisa Reynolds Barbounis, Tricia McNulty, and Marnie</p> <p>11 O'Brien Meyer, all came through counsel.</p> <p>12 Q. Then -- so then this should be easy for</p> <p>13 you then. So Daniel Pipes never spoke to you</p> <p>14 specifically about the allegations then.</p> <p>15 A. No, he did speak to me specifically</p> <p>16 about the allegations but after November 2nd.</p> <p>17 Q. In 2018 did he ever speak to you</p> <p>18 specifically about the allegations?</p> <p>19 A. He spoke to me generally about the</p> <p>20 allegations.</p> <p>21 Q. So in 2018 you never had a conversation</p> <p>22 where Daniel Pipes said, hey, she's saying that this</p> <p>23 and such and such happened at the AIPAC conference.</p> <p>24 I understand since then you might have had</p> <p>25 conversations during the course and scope of this</p>



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<p>1 litigation.</p> <p>2 A. Yeah.</p> <p>3 Q. But in 2018 --</p> <p>4 A. I had many conversations about this</p> <p>5 since the litigation began.</p> <p>6 Q. I understand that. But, like -- and</p> <p>7 I'm not -- that's not what I'm asking about. What</p> <p>8 I'm asking about is in 2018 did Daniel Pipes ever</p> <p>9 tell you that.</p> <p>10 A. To the best of my recollection I cannot</p> <p>11 remember having a specific conversation with Daniel</p> <p>12 Pipes without the presence of counsel, and I don't</p> <p>13 think I ever addressed him directly, about anything</p> <p>14 that Tricia McNulty alleges happened at the AIPAC</p> <p>15 conference. I did have a conversation which was of</p> <p>16 the nature Tricia McNulty says that you made unwanted</p> <p>17 sexual advances against her, what do you say, Mr.</p> <p>18 Roman, and I said absolutely not, didn't happen.</p> <p>19 Q. Well, how do you know it didn't happen</p> <p>20 if he didn't tell you what the allegations were?</p> <p>21 A. Because I've never in my life made a</p> <p>22 sexual advance towards Ms. McNulty. That's how I</p> <p>23 know, Mr. Carson.</p> <p>24 Q. Have you ever made a sexual advance to</p> <p>25 any woman in your life?</p>	<p>1 was?</p> <p>2 A. No, Mr. Carson, I had a very low</p> <p>3 opinion of Laura Frank.</p> <p>4 Q. Did you ever say where had you been all</p> <p>5 my life?</p> <p>6 A. No, Mr. Carson, I've never said that to</p> <p>7 Laura Frank.</p> <p>8 Q. Did you ever tell her at approximately</p> <p>9 2 p.m. on April 22nd that -- that you -- you called</p> <p>10 her to discuss plans for the IVP outreach and after a</p> <p>11 minute or two you -- did you sigh and say I need to</p> <p>12 be back in Puerto Rico, and when she said, yeah, I</p> <p>13 can imagine, did you reply next time I'm taking you</p> <p>14 with me without your husband of course?</p> <p>15 A. Who are you speaking about?</p> <p>16 Q. Laura Frank.</p> <p>17 A. No, I don't remember that.</p> <p>18 Q. Is it possible that you said that?</p> <p>19 A. No. Well, you would have to ask --</p> <p>20 what year are you speaking about?</p> <p>21 Q. April 22nd, 2016.</p> <p>22 A. No, I would not have said that because</p> <p>23 Laura Frank was never an employee of the Middle East</p> <p>24 Forum nor did I know Laura Frank on April 22nd, 2016.</p> <p>25 Q. Well, was it April 22nd, 2015, then?</p>
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<p>1 A. Mr. Carson, you have to be more</p> <p>2 specific.</p> <p>3 Q. That you work with.</p> <p>4 A. If you want to -- if you're asking me</p> <p>5 about my relations with my wife, I think that that's</p> <p>6 spousal privilege that I have. If you're asking me</p> <p>7 about things that happened before I met my wife, that</p> <p>8 was a long time ago, sir, so I really can't comment</p> <p>9 on that.</p> <p>10 Q. Have you ever made a sexual advance to</p> <p>11 any woman ever that you've ever worked with?</p> <p>12 A. No, I have not.</p> <p>13 Q. Have you ever made a sexual advance to</p> <p>14 -- let me ask you this. Have you ever said anything</p> <p>15 sexually inappropriate to anyone that you work with?</p> <p>16 A. Not that I remember, no.</p> <p>17 Q. Have you ever told a woman that you</p> <p>18 worked with that they should make the desks</p> <p>19 see-through so you can see their legs underneath the</p> <p>20 desk?</p> <p>21 A. No, Mr. Carson, I've never said that.</p> <p>22 Q. Did you ever tell Laura Frank where</p> <p>23 have you -- how much you loved her?</p> <p>24 A. No, Mr. Carson, I've never said that.</p> <p>25 Q. Did you ever tell her how great she</p>	<p>1 A. No, I didn't work at the Middle East</p> <p>2 Forum on April 22nd, 2015, Mr. Carson.</p> <p>3 Q. Well, was she an employee in April</p> <p>4 22nd, 2017?</p> <p>5 A. Not that I remember, Mr. Carson.</p> <p>6 Q. Well, when --</p> <p>7 A. She may have been.</p> <p>8 Q. When do you recall that she worked at</p> <p>9 the Middle East Forum?</p> <p>10 A. You would have to check her personnel</p> <p>11 record. I remember when she left the Middle East</p> <p>12 Forum.</p> <p>13 Q. When was that?</p> <p>14 A. When she was caught stealing</p> <p>15 information from Daniel Pipes and the Middle East</p> <p>16 Forum's server, she went to the Derek Smith Law Firm,</p> <p>17 she got a --</p> <p>18 Q. No, I asked when she -- when she</p> <p>19 stopped working there.</p> <p>20 A. Like I said, the specific date I don't</p> <p>21 remember, but I remember the circumstances of how she</p> <p>22 left the Middle East Forum.</p> <p>23 Q. I'll give you a chance to say it. Let</p> <p>24 me just keep going.</p> <p>25 Did you tell her that you really want</p>

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<p>1 to take her out for dinner and drinks?</p> <p>2 A. No, I never said that, Mr. Carson.</p> <p>3 Q. Did you invite her to your hotel room?</p> <p>4 A. No, I never did, Mr. Carson.</p> <p>5 Q. Did you tell her you wouldn't mind</p> <p>6 getting a little crazy with her?</p> <p>7 A. No, Mr. Carson, I didn't.</p> <p>8 Q. The quote that she alleges is that you</p> <p>9 said I don't -- I wouldn't mind -- I wouldn't mind</p> <p>10 getting a little crazy with you. Is that --</p> <p>11 A. No, Mr. Carson, I never said that.</p> <p>12 Q. Did Laura Frank ever accuse you of</p> <p>13 sexual harassment during her employment?</p> <p>14 A. No, Mr. Carson, she did not.</p> <p>15 Q. Did you ever go on to her -- did you</p> <p>16 ever review conversations she had with Lara Sciott?</p> <p>17 Do you remember Lara's last name? I don't pronounce</p> <p>18 it right.</p> <p>19 A. I don't know Lara Sciott, no. If</p> <p>20 you're talking --</p> <p>21 Q. S-c-i-o-t-t? How do you say --</p> <p>22 A. S-c-i-o-t-t, no, we've never had an</p> <p>23 employee named Lara Sciott.</p> <p>24 Q. S-z-o-t-t, Szott.</p> <p>25 A. Lara Szott.</p>	<p>1 Lara Szott, for instance, had volunteered with</p> <p>2 Palestinian refugee camps in Israel -- might have</p> <p>3 been Sudan -- but, anyway, she had been involved when</p> <p>4 she was a masters student at American University in</p> <p>5 activism and advocacy for organizations that were</p> <p>6 anathema to the Middle East Forum's positions. For</p> <p>7 instance, she would say I really think that you guys</p> <p>8 have to recategorize what a Palestinian refugee is,</p> <p>9 and put that in quotation marks in the record, and we</p> <p>10 would say, this at least being from the work that we</p> <p>11 did regarding UNRWA, which is an agency that deals</p> <p>12 with Palestine refugees, Ms. Szott, we don't see it</p> <p>13 that way, we consider these individuals to be fourth</p> <p>14 or fifth generation descendents of individuals who</p> <p>15 may back in 1948 be refugees but today they're</p> <p>16 individuals who are trying to take advantage of the</p> <p>17 international refugee system. So what we did was we</p> <p>18 would say we can't pursue that point of advocacy that</p> <p>19 you want to be able to go along with. And then what</p> <p>20 Ms. Szott did in response, and this was categorized</p> <p>21 and I think memorialized in a letter that went to the</p> <p>22 Lovitz Law Firm, L-o-v-i-t-z, if you're looking for</p> <p>23 the specific record, we have found that your client,</p> <p>24 and I'm not quoting this directly, but we can</p> <p>25 probably get you the letter that we sent if you want</p>
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<p>1 Q. I don't know how to pronounce it.</p> <p>2 A. Lara S-z-o-t-t, yeah, she worked at the</p> <p>3 Middle East Forum.</p> <p>4 Q. When did she work at the Middle East</p> <p>5 Forum?</p> <p>6 A. The specific dates I don't remember,</p> <p>7 but probably sometime around 2017.</p> <p>8 Q. Were Lara and Laura, did they -- were</p> <p>9 they friendly with each other when they worked at the</p> <p>10 Middle East Forum?</p> <p>11 A. Very much so.</p> <p>12 Q. Did you ever review electronic messages</p> <p>13 they sent each other during your employment at the</p> <p>14 Middle East Forum?</p> <p>15 A. Marnie Meyer and Matt Bennett I believe</p> <p>16 initiated an investigation of Lara Szott and Laura</p> <p>17 Frank which led to the conclusion, and this is also</p> <p>18 involved counsel to a certain extent, that they had</p> <p>19 been stealing information from the Middle East Forum</p> <p>20 and were planning on using that information to push</p> <p>21 forward what they characterize as a diametric</p> <p>22 political agenda to the Forum's goals.</p> <p>23 Q. What does that mean like in layman's</p> <p>24 terms?</p> <p>25 A. So be more -- be more layman's terms.</p>	<p>1 to see it, has engaged in the following activities</p> <p>2 which were illegal when she was here at the Middle</p> <p>3 East Forum. Abuse of the Computer Fraud and Abuse</p> <p>4 Act, stealing information from the Middle East Forum,</p> <p>5 taking donor lists -- and specifically what I</p> <p>6 remember is there is a website that is called</p> <p>7 WeTransfer. What you can do is you can take a</p> <p>8 body of information, upload it to another site, and</p> <p>9 then transfer it to a private device, and this is</p> <p>10 what Lara and Laura had facilitated in doing so, very</p> <p>11 much like what your client, Mr. Carson, did when she</p> <p>12 took information from MEF and basically took it into</p> <p>13 her own possession without authorization from the</p> <p>14 organization. So what I also find was a common</p> <p>15 thread between the two things is that they both went</p> <p>16 to the Derek Smith Law Firm, and that in and of</p> <p>17 itself was something that kind of raised alarms in my</p> <p>18 head when we actually had received the complaint that</p> <p>19 I guess you helped facilitate with the EEOC back in</p> <p>20 June of 2019.</p> <p>21 Q. Did you ever tell Laura Frank that</p> <p>22 maybe if you dress better more men would be talking</p> <p>23 to you and we would get better media hits?</p> <p>24 A. No, Mr. Carson.</p> <p>25 Q. And then she told you that was</p>

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<p>1 inappropriate and you said -- did you say --</p> <p>2 A. No, Mr. Carson, that never took place.</p> <p>3 Q. Well, how do you know you didn't say it</p> <p>4 if I didn't ask the question yet.</p> <p>5 A. Because the nature of the conversations</p> <p>6 which you are asking me quotes about never took place</p> <p>7 with Ms. Frank nor have they ever taken place with</p> <p>8 any female worker or male worker that I've ever</p> <p>9 worked with.</p> <p>10 Q. So you don't need to hear what the</p> <p>11 women allege; you know it didn't happen.</p> <p>12 A. No, because what I did do was before</p> <p>13 the deposition today I went paragraph by paragraph</p> <p>14 over a few documents. First document that I reviewed</p> <p>15 --</p> <p>16 Q. Well --</p> <p>17 A. -- was the complaint --</p> <p>18 Q. -- I didn't ask you what documents you</p> <p>19 reviewed.</p> <p>20 A. No, you're saying how do I know, right?</p> <p>21 So I'm --</p> <p>22 Q. I didn't say that.</p> <p>23 A. -- telling you how I know.</p> <p>24 Q. I know. I didn't ask that question.</p> <p>25 A. What you did ask was how I knew that</p>	<p>1 Q. Did you review anything else related to</p> <p>2 Laura Frank --</p> <p>3 A. I reviewed --</p> <p>4 Q. -- before today's deposition.</p> <p>5 A. Yeah, like I said, I reviewed the</p> <p>6 complaints that you had of Laura Frank and then I</p> <p>7 went back into our personnel records and looked at</p> <p>8 her history with her involvement with MEF that</p> <p>9 covered a period of time that the Derek Smith Law</p> <p>10 Firm was involved in conversations --</p> <p>11 Q. Well, what documents --</p> <p>12 A. -- with her.</p> <p>13 Q. -- did you review that related to Laura</p> <p>14 Frank other than the complaint?</p> <p>15 A. Well, that's it, I only reviewed the</p> <p>16 documents that related to her -- that related to what</p> <p>17 you wrote about her in the complaint from Lisa</p> <p>18 Barbounis.</p> <p>19 Q. So you're saying the only document you</p> <p>20 reviewed before today that related to Laura Frank was</p> <p>21 Lisa Barbounis's complaint?</p> <p>22 A. That's not what I said.</p> <p>23 Q. Well, then what -- what other document</p> <p>24 other than her complaint did you review?</p> <p>25 A. You make allegations in Lisa</p>
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<p>1 whatever you're alleging right now wouldn't be</p> <p>2 true --</p> <p>3 Q. Well, did you review --</p> <p>4 A. -- and I'm providing --</p> <p>5 Q. -- any documents --</p> <p>6 A. -- I'm providing you an answer.</p> <p>7 Q. Did you review any documents related to</p> <p>8 Laura Frank before today's deposition?</p> <p>9 A. In your complaint that you filed with</p> <p>10 the Court, whether it was the first complaint or the</p> <p>11 second amended complaint --</p> <p>12 Q. Mr. Roman, I asked you --</p> <p>13 A. -- or the answer --</p> <p>14 Q. -- a yes or no question. I said did</p> <p>15 you review --</p> <p>16 A. Mr. Carson --</p> <p>17 Q. -- any documents related to Laura</p> <p>18 Frank.</p> <p>19 A. -- I'm telling you about the documents</p> <p>20 that I reviewed.</p> <p>21 Q. I know. I didn't ask you what</p> <p>22 documents they were. I just said did you review any</p> <p>23 documents related to Laura Frank.</p> <p>24 A. I reviewed your complaints that had</p> <p>25 Laura Frank's name in it.</p>	<p>1 Barbounis's complaint that mention Laura Frank.</p> <p>2 Q. Right.</p> <p>3 A. Anything that related to any potential</p> <p>4 allegation that Laura Frank's name was included in as</p> <p>5 part of Lisa Barbounis's complaint --</p> <p>6 Q. So you --</p> <p>7 A. -- I went back into Laura Frank's file</p> <p>8 --</p> <p>9 Q. Tell me the specific documents you</p> <p>10 reviewed.</p> <p>11 A. I'm getting to that, Mr. Carson.</p> <p>12 Q. Just give me -- Mr. Roman --</p> <p>13 (Simultaneous speakers.)</p> <p>14 THE WITNESS: Mr. Carson, I'm</p> <p>15 trying to be specific.</p> <p>16 THE COURT REPORTER: I can't hear</p> <p>17 you when you're talking at the same</p> <p>18 time.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. No, no, I'm -- just tell me the</p> <p>21 documents you reviewed. Give me the names of them.</p> <p>22 A. Mr. Carson, I'm getting to that --</p> <p>23 there is no named documents.</p> <p>24 Q. No, no, there's no getting to that.</p> <p>25 That's the question.</p>

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<p>1 A. Mr. --</p> <p>2 Q. Tell me the documents you reviewed.</p> <p>3 There's the complaint. What else is there?</p> <p>4 A. Mr. Carson, there are other documents</p> <p>5 pertaining to Laura Frank.</p> <p>6 Q. Well, tell me what they are.</p> <p>7 A. There's Delaney Yonchek's complaint</p> <p>8 that mentions Laura Frank. There is Tricia McNulty's</p> <p>9 complaint that relates to Laura Frank.</p> <p>10 Q. Okay.</p> <p>11 A. There is Caitriona Brady's complaint</p> <p>12 that relates to Laura Frank. There is a contingency</p> <p>13 agreement that Laura Frank stored on her computer</p> <p>14 from the Derek Smith Law Group. So if you would like</p> <p>15 to --</p> <p>16 Q. Did you review that contingency</p> <p>17 agreement before --</p> <p>18 A. I did. I did review that, Mr. Carson.</p> <p>19 Q. Did you review anything else besides</p> <p>20 the three -- the four complaints --</p> <p>21 A. I reviewed the --</p> <p>22 Q. -- and the contingency agreement.</p> <p>23 A. I reviewed the letter that the Middle</p> <p>24 East Forum sent to Laura Frank that related to her</p> <p>25 termination from the Middle East Forum.</p>	<p>1 you would like to see them.</p> <p>2 Q. Sure. Since you turned nothing over in</p> <p>3 connection with Laura Frank, I ask that everything</p> <p>4 you just referenced that you reviewed before --</p> <p>5 A. I'm not -- I'm not trying to tell you</p> <p>6 that we're willing or not willing to. You're asking</p> <p>7 for -- I'm instructing counsel of course with the</p> <p>8 agreement of in-house counsel that the items related</p> <p>9 to Laura Frank's theft of information from the Middle</p> <p>10 East Forum, the circumstances for her departure,</p> <p>11 definitely be made available to you. They're very</p> <p>12 similar to what your clients did.</p> <p>13 Q. So let's continue. So I don't even</p> <p>14 need to read anything to do with Laura Frank because</p> <p>15 you just -- you deny it all anyway, right? Is that</p> <p>16 --</p> <p>17 A. Hundred percent.</p> <p>18 Q. Okay.</p> <p>19 A. Well, let me be more specific, okay --</p> <p>20 Q. Yeah, it doesn't matter what she --</p> <p>21 A. -- because --</p> <p>22 Q. -- said; you deny it.</p> <p>23 A. No, it's -- if she said that I asked</p> <p>24 her to develop a communication strategy for the</p> <p>25 Middle East Forum, that would be true, so I can't</p>
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<p>1 Q. Did you review anything else besides</p> <p>2 the contingency agreement, the letter, and the four</p> <p>3 complaints?</p> <p>4 A. Any of the documents that were around</p> <p>5 that is what I reviewed, but nothing else that I can</p> <p>6 remember I reviewed around Laura Frank -- I have</p> <p>7 reviewed other documents between June of 2019 and</p> <p>8 today that relates to Laura Frank, but the specificity</p> <p>9 of those documents I wouldn't be able to tell you</p> <p>10 today.</p> <p>11 Q. I'm asking you specifically before</p> <p>12 today's deposition, you named four, five -- you named</p> <p>13 six documents, you named the four complaints,</p> <p>14 McNulty, Barbounis, Brady, Yonchek, you named the</p> <p>15 contingency agreement, and you named a letter.</p> <p>16 A. Not just a letter, the letter, anything</p> <p>17 surrounding the letter, so there was --</p> <p>18 Q. Well, what else surrounding the letter</p> <p>19 did you review?</p> <p>20 A. There was attachments that were with</p> <p>21 the letter --</p> <p>22 Q. Did you review those before --</p> <p>23 A. -- I think that there was -- I don't</p> <p>24 remember. This was months in the process of</p> <p>25 being able to go. We do have those attachments if</p>	<p>1 deny that, but if you're asking me about something of</p> <p>2 a sexual nature, there was nothing ever to be</p> <p>3 speaking of.</p> <p>4 Q. Yeah, you deny every -- every</p> <p>5 allegation of sexual harassment that any woman ever</p> <p>6 made in connection with you, correct?</p> <p>7 A. Yes, I have never sexually harassed a</p> <p>8 woman, Mr. Carson.</p> <p>9 Q. You never said anything sexually</p> <p>10 inappropriate about a woman.</p> <p>11 A. Your question is what? Have I ever</p> <p>12 said anything sexually --</p> <p>13 Q. Have you ever said anything --</p> <p>14 A. -- inappropriate about a woman?</p> <p>15 Q. Have you ever said anything sexually</p> <p>16 inappropriate about a woman who you work with?</p> <p>17 A. No, I have not.</p> <p>18 Q. So all the allegations that Lisa</p> <p>19 Barbounis made, false.</p> <p>20 A. Hundred percent false, correct.</p> <p>21 Q. All the allegations that Patricia</p> <p>22 McNulty made, they're false.</p> <p>23 A. Of a sexual nature? False.</p> <p>24 Q. Yeah.</p> <p>25 A. Yes.</p>



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<p>1 Q. All the allegations that Leah Merville 2 made, they're false? 3 A. I've never heard any allegations from 4 Leah Merville. 5 Q. Said that you guys had a sexual 6 relationship. Is that false? 7 A. That is false, correct. 8 Q. How about Alana Goodman, is everything 9 she said false? 10 A. Alana Goodman, I heard a tape last -- 11 when was it, on Wednesday -- 12 Q. Yeah. 13 A. -- or Tuesday, they had provided, so if 14 you would like to go over that tape again I can tell 15 you what I believe is true and what's false. 16 Q. Did you take your penis out in front of 17 her at a bar? 18 A. No, I never did. 19 Q. Did you yell at her that she needed to 20 come to your hotel room because you had a story 21 there? 22 A. No. I have shared stories with Alana 23 Goodman, but I never invited her to a hotel room to 24 give her a story. 25 Q. You never invited Leah Merville to a</p>	<p>1 Mr. Carson. 2 Q. Laura Frank and Lara Szott, everything 3 they said about you in regards to sexual misconduct 4 or sexual questions or sexual comments, none of those 5 happened, correct? 6 A. Nothing happened, Mr. Carson. 7 Q. How about Tiffany Lee, is her entire 8 charge of sexual harassment involving you, that's all 9 false, too? 10 A. Tiffany Lee is actually an interesting 11 case. 12 Q. Well, just answer the question. Is -- 13 A. I'm answering your question. She -- 14 Q. My question is is her charge of 15 discrimination that she filed, are all those 16 allegations false? 17 A. Mr. Carson, yes, and -- it's not that 18 it's just false, it was fabricated by the Derek Smith 19 Law Firm. 20 Q. Why do you think it was fabricated by 21 Derek Smith Law Firm? 22 A. You would have to refer to the response 23 of the Cozen O'Connor law firm from 2016 where it was 24 proven that Ms. Lee fabricated text messages that 25 were sent to me and then didn't only just fabricate</p>
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<p>1 hotel room? 2 A. No, I've never invited Leah Merville to 3 a hotel room. 4 Q. Did you ever invite Gabrielle Bloom to 5 a hotel room? 6 A. No, I have never invited Gabrielle 7 Bloom to a hotel room. 8 Q. Did you ever subject her to sexual 9 harassment? 10 A. No, I did not, Mr. Carson. 11 Q. How about Marnie Meyer, everything she 12 said is false? 13 A. Well, you have to tell me what she said 14 and I can tell you what's true and false. 15 Q. She said that she had to tell you that 16 she's never going to have sex with you, did she say 17 that to you? 18 A. No, I never heard that from her, Mr. 19 Carson. 20 Q. She's lying, correct? 21 A. What is she lying about? 22 Q. Well, she wrote a complaint, didn't 23 she, where she made that allegation? 24 A. The complaint where Marnie Meyer wrote 25 anything that was of a sexual nature is incorrect,</p>	<p>1 it but also misinterpreted the information. We 2 actually never received any -- 3 Q. What do you think it has to do with 4 Derek Smith Law Group, though? 5 A. Because Derek Smith Law Group wrote the 6 complaint, Mr. Carson. Actually, in fact, the 7 attorney who wrote that complaint, I just found this 8 out about two weeks ago, has been working with you to 9 try to do the same thing that Tiffany Lee tried to do 10 to us four years ago. And if you want another piece 11 of information I found out yesterday when I was 12 looking over the complaints that you filed against 13 the Middle East Forum, myself, Daniel Pipes, and 14 others, Caroline Miller is the woman I'm talking 15 about, who I actually went to legal advice for, which 16 I cannot believe the unethical nature of what she's 17 trying to do here, it just blows my mind, but, beyond 18 that, her name -- 19 Q. What do you think -- 20 A. This is what I found out yesterday. 21 This is what I found out yesterday. Caroline 22 Miller's name -- 23 Q. Well, there's no question on the table 24 about Caroline Miller. 25 A. I'm trying to get to -- you asked me</p>

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<p>1 why I think --</p> <p>2 THE COURT REPORTER: I can't hear</p> <p>3 you when you're talking at the same</p> <p>4 time.</p> <p>5 THE WITNESS: Excuse me, Ms.</p> <p>6 Carrie.</p> <p>7 You asked me why I think the Derek</p> <p>8 Smith Law Group was responsible for</p> <p>9 making those accusations. I'm giving</p> <p>10 you the answer. Not only was it</p> <p>11 Caroline Miller who I think was involved</p> <p>12 in the administrative action which ended</p> <p>13 up with a no cause and no lawsuit after</p> <p>14 Tiffany Lee was involved, but upon</p> <p>15 further examination when I was preparing</p> <p>16 an affidavit yesterday for a separate</p> <p>17 case, I found out that Caroline Miller's</p> <p>18 name was in the metadata associated with</p> <p>19 the complaints that you filed with the</p> <p>20 EEOC, and I don't know why an attorney</p> <p>21 in Miami as your coworkers --</p> <p>22 BY MR. CARSON:</p> <p>23 Q. What does that mean, the metadata?</p> <p>24 A. What it means, Mr. Carson, is that</p> <p>25 an attorney with an obvious conflict of interest --</p>	<p>1 advice for be involved in drafting complaints --</p> <p>2 Q. Mr. Roman, I'm going to ask that you</p> <p>3 just slow down and stop asking questions and let me</p> <p>4 just --</p> <p>5 A. Sure. Sure. It's a hypothetical,</p> <p>6 Mr. Carson. You're used to this.</p> <p>7 Q. I'm getting -- I'm just -- I'm trying</p> <p>8 to give you an opportunity to explain what you're</p> <p>9 talking about --</p> <p>10 A. Sure.</p> <p>11 Q. -- to this sort of nonissue, but, like,</p> <p>12 when you talk about metadata, where are you seeing</p> <p>13 this metadata?</p> <p>14 A. Which metadata are you referring to?</p> <p>15 Q. To metadata that you just referred to.</p> <p>16 A. Well, the metadata that I was referring</p> <p>17 to was the evidence that was in files you provided to</p> <p>18 the Middle East Forum.</p> <p>19 Q. What files? Where are you seeing --</p> <p>20 A. Mr. Carson, if you look at the record</p> <p>21 and you're following the record, you'll see this.</p> <p>22 EEOC complaints --</p> <p>23 Q. What record? Explain.</p> <p>24 A. The record that the stenographer has</p> <p>25 been taking for the past seven minutes that we've</p>
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<p>1 Q. No --</p> <p>2 A. -- assisted you --</p> <p>3 Q. -- I'm not asking you --</p> <p>4 A. -- assisted you --</p> <p>5 Q. I'm not asking you about --</p> <p>6 A. -- in again trying to drum up</p> <p>7 complaints against the Middle East Forum.</p> <p>8 Q. I'm asking you --</p> <p>9 A. It's all there -- it's all there in the</p> <p>10 record.</p> <p>11 Q. Yeah, what metadata are you referring</p> <p>12 to?</p> <p>13 A. Okay. If you go to the EEOC complaint</p> <p>14 that your clients filed against the Middle East Forum</p> <p>15 and if you go to the complaint that was uploaded in</p> <p>16 PACER and also in -- I think it was in the e-mails</p> <p>17 you sent to Marc Fink, in-house counsel, and you open</p> <p>18 it up, the PDF file, and you look at -- that you have</p> <p>19 the time it's written, the subject, the file</p> <p>20 location, and you look at the author line, it says</p> <p>21 Caroline Miller.</p> <p>22 Q. The author line where?</p> <p>23 A. In the metadata of the PDF associated</p> <p>24 with your complaints. Why would someone I went to</p> <p>25 legal advice -- why would someone I went to legal</p>	<p>1 been speaking about this. I'll try to do it again so</p> <p>2 I break it down for you.</p> <p>3 Q. Yeah, give it a try.</p> <p>4 A. I'll give you -- if you'll allow me to</p> <p>5 give the whole --</p> <p>6 Q. No, I don't want you to give the whole</p> <p>7 -- I want you to say specifically where you saw the</p> <p>8 metadata. Let me help you. I sent an e-mail from me</p> <p>9 to my paralegal. If you look at the metadata in that</p> <p>10 e-mail, you'll see that it went from me to my</p> <p>11 paralegal.</p> <p>12 A. That's not where the metadata is.</p> <p>13 Q. Identify where you saw the metadata.</p> <p>14 A. In the author field of at least one of</p> <p>15 the complaints, whether they be the EEOC or the</p> <p>16 complaints that you filed with the Eastern District</p> <p>17 of Pennsylvania against the Middle East Forum, Daniel</p> <p>18 Pipes, myself, and Matthew Bennett, that had the name</p> <p>19 Caroline Miller.</p> <p>20 Q. When a complaint is filed with the</p> <p>21 Eastern District of Pennsylvania it's filed on their</p> <p>22 ECF system; do you understand that?</p> <p>23 A. What I'm saying is is that the</p> <p>24 complaint that you forwarded to Marc Fink -- if you</p> <p>25 look back in the record, that's what I said, not that</p>

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<p>1 was filed. The complaint can be filed multiple</p> <p>2 places, you send it to Marc, you send it to our</p> <p>3 counsel, Dave Walton, you send it to the ECF system,</p> <p>4 but the original file in the original metadata of the</p> <p>5 draft complaint, whether it was the EEOC or of the</p> <p>6 complaint of the employment nature before you filed</p> <p>7 the lawsuit, have Caroline Miller's name listed in</p> <p>8 the metadata. She assisted you with drafting these</p> <p>9 complaints, Mr. Carson. She violated her -- the</p> <p>10 rules of professional responsibility associated with</p> <p>11 an attorney because I went to her for legal advice</p> <p>12 before I knew any of you or the name of Derek Smith.</p> <p>13 It's really amazing that I found this out in the past</p> <p>14 two weeks in preparation for this deposition today</p> <p>15 and it's actually the subject of a motion for</p> <p>16 disqualification in another case. It's really really</p> <p>17 amazing what you guys have been able to do, you know,</p> <p>18 and -- but now you've gotten caught and your</p> <p>19 colleagues are lying in affidavits that they file</p> <p>20 with the Court. So you'll have to excuse me if I'm a</p> <p>21 little bit perturbed by this, but if it's news to</p> <p>22 you, I would be happy to explain more.</p> <p>23 Q. I have no clue what you're even talking</p> <p>24 about.</p> <p>25 A. Okay. You're fine. Look, all you have</p>	<p>1 from a complaint I forwarded to Marc Fink; is that</p> <p>2 what you said?</p> <p>3 A. Okay. This is what I said. There were</p> <p>4 communications that took place between you and Marc</p> <p>5 Fink in June of 2018.</p> <p>6 Q. Okay.</p> <p>7 A. There also were communications that you</p> <p>8 had with Dave Walton and Cozen O'Connor, maybe Sidney</p> <p>9 Gold was involved in that, I'm not sure, I believe in</p> <p>10 August and September of 2018.</p> <p>11 Q. Okay.</p> <p>12 A. Excuse me. I have my dates wrong.</p> <p>13 June of 2019, and August, September, and October of</p> <p>14 2019 prior to your filing two complaints on October</p> <p>15 27th, 2019, that was McNulty versus MEF and Barbounis</p> <p>16 versus MEF, and then I believe you filed Yonchek and</p> <p>17 Brady a few days later, at least -- whatever the date</p> <p>18 is in PACER. In at least one, if not more, of those</p> <p>19 complaints, whether it was a copy of the EEOC</p> <p>20 complaint that you sent to Marc Fink or a copy of a</p> <p>21 draft complaint before you filed it in the ECF system</p> <p>22 of PACER and all of these documents were then put</p> <p>23 into a custodian and control system for discovery</p> <p>24 review called Relativity, okay, so it's taken from</p> <p>25 you sending it, it goes to counsel --</p>
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<p>1 to do is follow what's going on in the cases.</p> <p>2 Q. Well, why don't you just explain -- I</p> <p>3 mean, you still haven't explained --</p> <p>4 A. I just explained it to you, Mr. Carson.</p> <p>5 Q. You said it's in the metadata on the</p> <p>6 document that I filed with the ECF system; is that</p> <p>7 what you said?</p> <p>8 A. No, that's not what I said. I said --</p> <p>9 Q. Then you said it's in the metadata --</p> <p>10 A. -- I said that the document --</p> <p>11 Q. You got to -- Mr. Roman --</p> <p>12 A. Okay. Let's break it down very simply.</p> <p>13 Okay?</p> <p>14 Q. Well, wait --</p> <p>15 A. There is a few --</p> <p>16 Q. Mr. Roman, remember, this is a</p> <p>17 question-answer. So you got to let me ask you the</p> <p>18 question and then you got to say the answer --</p> <p>19 A. Ask your question, please.</p> <p>20 Q. You can't jump --</p> <p>21 A. I'm sorry. I apologize for</p> <p>22 interrupting you. If you would like to get a glass</p> <p>23 of water, please, we can do that, we can reset in 30</p> <p>24 seconds if it's too confusing for you.</p> <p>25 Q. I think you said it's in the metadata</p>	<p>1 Q. Documents that I -- from -- that I</p> <p>2 e-mailed people are on Relativity?</p> <p>3 A. Of course they are. They're evidence,</p> <p>4 Mr. Carson.</p> <p>5 Q. Mr. Roman, there is nothing -- nothing</p> <p>6 related to my e-mails ever been produced --</p> <p>7 A. No, Mr. Carson, your complaints that</p> <p>8 you sent to Mr. Fink from the EEOC and your draft</p> <p>9 complaints that you sent to our organization's</p> <p>10 counsel prior to you filing them with the Eastern</p> <p>11 District of Pennsylvania by way of the ECF system are</p> <p>12 in a system that, since you probably already had</p> <p>13 possession of the documents, you would know this,</p> <p>14 indicate that Caroline Miller was the author of one,</p> <p>15 if not more, of those documents.</p> <p>16 Q. Yeah, that's -- what you're saying</p> <p>17 is --</p> <p>18 A. That's what I'm saying.</p> <p>19 Q. It's just not --</p> <p>20 A. And you know what, if we want to take</p> <p>21 like a few minutes here so I can prove it to you, I</p> <p>22 would love to do it on the record, it will help me</p> <p>23 with my motion to disqualify your firm from the other</p> <p>24 case.</p> <p>25 Q. I would be happy to give you a minute</p>

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<p>1 if you want to show me what you're talking about.</p> <p>2 A. We can probably do that. I think it's</p> <p>3 probably lunchtime now, but --</p> <p>4 Q. Do you want to take a lunch break and</p> <p>5 then --</p> <p>6 A. No, I'm fine talking to you about this,</p> <p>7 Mr. Carson. I'm just trying to tell you what's going</p> <p>8 on, I'm trying to enlighten you with what's going on</p> <p>9 at your own firm, which I thought you would know</p> <p>10 about.</p> <p>11 Q. I mean, listen, I feel like we just</p> <p>12 wasted 20 minutes, but that's okay I guess.</p> <p>13 A. Okay.</p> <p>14 Q. But I would suggest to you that if</p> <p>15 there is information that you want me to look at</p> <p>16 related to the, you know, information you just told</p> <p>17 me, I would be more than happy to look at it.</p> <p>18 A. That's great.</p> <p>19 Q. So do you want to take a break and get</p> <p>20 that or do you want to just move on? How do you want</p> <p>21 to -- it's up to you.</p> <p>22 A. Mr. Carson, this is your deposition.</p> <p>23 So you ask the questions, I'll give the answers.</p> <p>24 MR. CARSON: Okay. Does anyone</p> <p>25 want to take a lunch break so Mr. Roman</p>	<p>1 MR. GOLD: More than happy to do</p> <p>2 it. All right?</p> <p>3 THE VIDEO SPECIALIST: We're off</p> <p>4 the record. It's 2:39 p.m.</p> <p>5 (A lunch recess was taken.)</p> <p>6 THE VIDEO SPECIALIST: It is 3:30</p> <p>7 p.m., and we are back on the record.</p> <p>8 BY MR. CARSON:</p> <p>9 Q. So did you find the documents you were</p> <p>10 talking about with this metadata?</p> <p>11 A. I did, yes.</p> <p>12 Q. Do you want to share the screen or put</p> <p>13 one up?</p> <p>14 A. Is that okay? I mean, how do I -- do</p> <p>15 I -- Roman 3? Roman 5?</p> <p>16 Q. I want to get through it quickly</p> <p>17 because we have a lot of other stuff to talk about,</p> <p>18 but --</p> <p>19 A. Yeah, sure.</p> <p>20 Q. I mean, I'm obviously -- I can't</p> <p>21 respond to it, but I guess I'll let you explain what</p> <p>22 it is on the record if you want.</p> <p>23 A. Sure. So I'm going to share my screen.</p> <p>24 Is this okay -- how do we do this? Do I, like,</p> <p>25 share, is it Roman 2, or do you label it, like --</p>
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<p>1 can obtain these documents and everyone</p> <p>2 can eat lunch?</p> <p>3 THE WITNESS: Well, if I look for</p> <p>4 any of the documents, I'll probably do</p> <p>5 it while I'm on the record. If you want</p> <p>6 to submit an interrogatory or a request</p> <p>7 for production of documents, you can</p> <p>8 please give that to Mr. Cavalier or</p> <p>9 Mr. Gold.</p> <p>10 MR. CARSON: Okay.</p> <p>11 MR. GOLD: I assume the court</p> <p>12 reporter needs a break for lunch, is</p> <p>13 that what you want to take a break for</p> <p>14 lunch, is that it? Okay. So it's now</p> <p>15 2:38. I mean, whatever time you need</p> <p>16 just tell me and we'll take a break.</p> <p>17 MR. CARSON: I mean, can you guys</p> <p>18 -- can Mr. Roman, like -- you know, can</p> <p>19 you guys produce these documents that</p> <p>20 you're referring to?</p> <p>21 MR. GOLD: We'll come back after</p> <p>22 lunch with the documents. All right?</p> <p>23 MR. CARSON: Yeah, I'm not sure it</p> <p>24 matters, but I'm just curious what he's</p> <p>25 talking about.</p>	<p>1 Q. Yeah, you can label it Roman 2.</p> <p>2 A. Okay. So this is in PACER. Okay?</p> <p>3 This is in a filing that's in the Meyer O'Brien</p> <p>4 versus MEF case, it's Exhibit --</p> <p>5 Q. Yeah, I've --</p> <p>6 A. It's Exhibit 2. Right? So the way I</p> <p>7 came to know about this was, we have these documents,</p> <p>8 this is between you and Lisa, and she forwarded this</p> <p>9 to Marnie, so I don't want to, like, to be said that</p> <p>10 I'm, like, trying to breach privilege or anything.</p> <p>11 Okay? This is something that Lisa sent to Tricia and</p> <p>12 Marnie prior to Marnie having an attorney. All</p> <p>13 right? So I just want to make that clear. I'm not</p> <p>14 trying to do any, like, privilege funny business.</p> <p>15 Okay? And you say here, another interesting note,</p> <p>16 the attorney that used to run our Philly office runs</p> <p>17 our Miami office that's one person, that is Caroline</p> <p>18 Miller, who was listed as the attorney on the</p> <p>19 administrative action from 2016 with Tiffany Miller</p> <p>20 -- sorry, Tiffany Lee. Can I, like, say scratch it</p> <p>21 on the record? I think that's only something you can</p> <p>22 say, Mr. Carson. Sorry about that. Tiffany Lee's</p> <p>23 attorney in the EEOC administrative matter from 2016.</p> <p>24 Now, Caroline Miller is also somebody that I sought</p> <p>25 legal advice from on April 23rd, 2016, at 10:42 p.m.</p>



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<p>1 in the evening, this is a picture from when I went  2 there, between then and sometime later that evening  3 here in Bala Cynwyd, Pennsylvania. I signed an  4 affidavit to that effect. There is a second  5 affidavit being attached to another filing which is a  6 reply to Derek Smith Law Group's response to motion  7 to disqualify, just to make sure everything is clean  8 on the record. All right? I even pulled it up in  9 PACER if you want to go through this stuff. Okay?  10 So then I went back into the discovery database of  11 the documents that had been provided either by the  12 EEOC -- like, you know that website you go into and  13 you download the filing, upload it and then it  14 becomes available to the person or the organization  15 you filed against and the person can download it or  16 counsel can download, right? So there's first -- I  17 just got to get to this. Shoot. I disconnected --  18 MR. CARSON: I would just put an  19 objection on the record to the extent I  20 think the witness just -- or the  21 defendant just showed text message  22 communications between counsel and  23 client.  24 BY MR. CARSON:  25 Q. But besides that, keep going,</p>	<p>1 into this, you'll see that your letter has the name  2 in properties Derek Smith. Okay? This is the  3 metadata that I'm talking about. Tells us that you  4 created the file on June 20th, tells you that you  5 saved it and modified it on June 20th, this is when  6 you converted your word file that I'm assuming you  7 wrote this on, turned it into a -- actually you call  8 it research America Bernhardt. I don't know why you  9 would be calling us Bernhardt. Is that somebody else  10 that you filed a complaint against.  11 Q. Because when we do stuff, Mr. Roman, we  12 usually track --  13 A. Okay. Well, anyway, there's --  14 Q. So what that might mean is that she --  15 nothing, just keep going.  16 A. Yeah, sure, I mean, whatever you --  17 we'll be in court to talk about this probably, but  18 this is just my finding out that Caroline Miller was  19 named on a document that was on MEF four years after,  20 three years after, whatever. So she's here, says  21 Derek Smith. All right. Derek Smith, name of the  22 firm, right, maybe Derek Smith wrote it, somebody  23 else wrote -- but guess what, Derek Smith's name is  24 there on Bernhardt but it's MEF, so you guys --  25 however your file management practices, whatever. So</p>
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<p>1 Mr. Roman.  2 A. I wasn't trying to do that, Mr. -- I  3 was --  4 Q. I'm just preserving an objection.  5 That's all. You can continue.  6 A. Okay. I'm sorry. I didn't -- did I do  7 something wrong?  8 Q. No, you did not.  9 A. All right. I'm not trying to, like, do  10 any funny business. All right?  11 Q. Yeah, you're good.  12 A. So then you sent an e-mail to Marc Fink  13 on June 20th, 2019, which I will call this Roman  14 whatever -- shoot. Hold on. I'll call this Roman  15 whatever. Okay? Whatever number you --  16 Q. Roman 3.  17 A. Roman 3. I just got to share my  18 screen. Sorry. Where is it. There you go. So this  19 is Roman 3. This is a notice that you sent to Marc  20 Fink by way of e-mail on June 20th -- you sent a  21 letter and here is the complaint or people have  22 complained about you, whatever else. This is when  23 you tell us that you're doing the EEOC thing. Right?  24 And then the full filing is obtained -- which is like  25 the handwritten letter, everything else, so if you go</p>	<p>1 then when we go to the full EEOC filing, which is  2 downloaded from the EEOC --  3 Q. Wait, what -- I don't understand.  4 Like, what did you just show us with the last  5 document?  6 A. What did I show you?  7 Q. Yeah.  8 A. So here Derek Smith was involved in the  9 drafting of this letter or at least --  10 Q. I'm sorry --  11 A. -- his metadata --  12 Q. -- I'm not looking at that -- you're  13 saying that --  14 A. The author's name, okay, if you want to  15 find out who the author of a document is, the only  16 way to provide a forensic footprint of who did that  17 document is by showing who is in the metadata. So  18 the metadata indicates here that Derek Smith was  19 involved in the drafting of the complaint, of the  20 letter --  21 Q. Wait, wait, the complaint?  22 A. No, not the complaint, the letter that  23 you sent to Marc Fink on June 20th. So maybe he  24 reviewed your work, maybe he made edits to it, maybe  25 he put together the PDF, maybe he did a lot of</p>

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<p>1 things. We don't know. Only you know, Mr. Carson.</p> <p>2 I don't know. But I know that Derek Smith was</p> <p>3 forensically attached to this file. Okay? I'm just</p> <p>4 telling you what I'm thinking here. We can get an</p> <p>5 expert -- I don't know, that's not me. I'm not the</p> <p>6 expert -- I'm just saying how I came to the</p> <p>7 conclusion that you asked me why I thought Caroline</p> <p>8 Miller helped fabricate evidence against MEF. So</p> <p>9 then we get to the full EEOC filing. Okay? Call</p> <p>10 this Roman 4. And this, if you're familiar with this</p> <p>11 document, is Lisa Barbounis's handwritten complaint</p> <p>12 against MEF, she signed it, it's got the thing here,</p> <p>13 Commonwealth of Pennsylvania, and then it's your</p> <p>14 letter from June 20th and the parties and statement</p> <p>15 of facts --</p> <p>16 Q. I know what it is. Keep going.</p> <p>17 A. -- whatever else. So when we go to the</p> <p>18 metadata from this, Caroline Miller's name shows up.</p> <p>19 So why would a document you write that has Derek</p> <p>20 Smith on it then be combined by a different user with</p> <p>21 two separate documents, handwritten, letter,</p> <p>22 statement to the EEOC, by anyone other than Seth</p> <p>23 Carson. Maybe Caroline Miller was supervising you,</p> <p>24 maybe she was involved in the drafting of the</p> <p>25 complaint, maybe as we relate to the personal</p>	<p>1 correct?</p> <p>2 A. Yes.</p> <p>3 Q. In 2018.</p> <p>4 A. Spoke to me many times on the phone in</p> <p>5 2018.</p> <p>6 Q. Relating to the allegations of sexual</p> <p>7 harassment.</p> <p>8 A. I think my answer on the record stands.</p> <p>9 Q. Can you -- it's at least once, correct?</p> <p>10 A. Yes. As I said, my record on the</p> <p>11 answer stands. My answer on the record stands.</p> <p>12 Q. I know, but you can't answer that. You</p> <p>13 have to just answer the questions. You can't just</p> <p>14 say my record stands.</p> <p>15 A. Well, Mr. Carson, I've answered the</p> <p>16 question already. My answer on the record stands.</p> <p>17 Q. I'm reviewing it. Okay? So at least</p> <p>18 once, and that one time you said he didn't speak to</p> <p>19 you specifically about any specific allegations, he</p> <p>20 talked to you generally and you used the language --</p> <p>21 A. Is my screen off? I just want to make</p> <p>22 sure that I'm -- that I'm not sharing my screen</p> <p>23 anymore, am I? I'm good?</p> <p>24 Q. I don't think so.</p> <p>25 A. Okay. Thank you.</p>
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<p>1 knowledge that you talked to your client about in a</p> <p>2 text message you got advice from Caroline Miller on</p> <p>3 how to file a complaint against MEF. Maybe you guys</p> <p>4 worked together. I don't know. That's only between</p> <p>5 the two of you. So that's how I came to that</p> <p>6 conclusion, Mr. Carson. And I'm not here questioning</p> <p>7 you, you're here questioning me, but if there is</p> <p>8 anything else I can teach you about metadata, I would</p> <p>9 love to -- there is a lot of metadata in this case.</p> <p>10 I would be happy to speak about all of it at least to</p> <p>11 the best of my ability. So that's why Caroline</p> <p>12 Miller should be disqualified from this case, at</p> <p>13 least screened, and that's why we have sought to</p> <p>14 disqualify your entire firm from involvement in the</p> <p>15 Meyer matter, but I'm not the lawyer here; you are.</p> <p>16 You tell me about ethics.</p> <p>17 Q. All right. So we're going to move on</p> <p>18 now. Thank you, Mr. Roman.</p> <p>19 A. Sure.</p> <p>20 Q. So -- all right. Let's get back to</p> <p>21 something that is actually relevant to this case,</p> <p>22 which is the reports of discrimination and harassment</p> <p>23 in the workplace. So I think we were talking about</p> <p>24 instances in 2018 when Mr. Pipes spoke with you, you</p> <p>25 said he spoke to you on the phone at least once,</p>	<p>1 Q. -- and you used the language in this</p> <p>2 letter as an example of the general conversation that</p> <p>3 you and Mr. Pipes had, you said he kind of -- he told</p> <p>4 you that there were allegations of misconduct</p> <p>5 directed against you, that three women, made unwanted</p> <p>6 sexual advances, but that was -- that was about the</p> <p>7 extent of the conversation that you had with</p> <p>8 Mr. Pipes in 2018, correct?</p> <p>9 A. No, that's incorrect.</p> <p>10 Q. Okay. So what else did you talk about</p> <p>11 in 2018 --</p> <p>12 A. It's not what else I spoke to about;</p> <p>13 you have to bifurcate it. Okay?</p> <p>14 Q. Just listen to the question.</p> <p>15 A. Sure.</p> <p>16 Q. What else did you speak to Mr. Pipes</p> <p>17 about in 2018 in connection with these three women's</p> <p>18 allegations of sexual harassment?</p> <p>19 A. Okay. So if it's about sexual</p> <p>20 harassment -- your previous question was about</p> <p>21 allegations, and you gave the --</p> <p>22 Q. Allegations of sexual harassment, so</p> <p>23 we're specifically talking about the conversations</p> <p>24 that you had with Mr. Pipes in 2018 in connection</p> <p>25 with these three women's allegations of sexual</p>

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<p>1 harassment.</p> <p>2 A. Again, he generalized the</p> <p>3 description --</p> <p>4 Q. That wasn't the question.</p> <p>5 A. -- saying -- I'm giving an answer.</p> <p>6 Q. Okay. I mean, I just said that and you</p> <p>7 said that wasn't correct, but go ahead.</p> <p>8 A. It wasn't correct because your previous</p> <p>9 question was what allegations. Now you're saying</p> <p>10 sexual allegations, so I'm trying to really bifurcate</p> <p>11 between management issues and then unproven</p> <p>12 allegations of alleged unwanted sexual advances as</p> <p>13 it's quoted here in the letter.</p> <p>14 Q. Okay.</p> <p>15 A. So if it's about sex --</p> <p>16 Q. Okay. If you want to make the</p> <p>17 distinction --</p> <p>18 A. -- general; management, very different.</p> <p>19 Q. We're not here today to talk about</p> <p>20 management. We're here today to talk about</p> <p>21 violations of specific statutes including Title 7,</p> <p>22 including the Pennsylvania Human Relations Act,</p> <p>23 including the Philadelphia Fair Practice Ordinance,</p> <p>24 so let's relegate our conversation today to</p> <p>25 allegations of sexual harassment. Please explain</p>	<p>1 Q. Okay. So --</p> <p>2 A. And then what he did was --</p> <p>3 Q. I understand. So did he ever have a</p> <p>4 conversation with you where he specifically spoke to</p> <p>5 you about each woman's specific allegations in 2018?</p> <p>6 A. Not that I can -- I can recall a</p> <p>7 privileged conversation I had with counsel, but I</p> <p>8 cannot recall discussing the specifics, and the</p> <p>9 specifics you're talking about -- you'll have to tell</p> <p>10 me which specific you're asking about to see if I</p> <p>11 discussed it with Pipes, but I cannot recall</p> <p>12 generally specific allegations beyond what I talked</p> <p>13 about with counsel.</p> <p>14 Q. All right. So the conversation you had</p> <p>15 with counsel, we're going to talk about that a little</p> <p>16 bit. We're going to figure out what happened there.</p> <p>17 A. Sure.</p> <p>18 Q. So the conversation you had with</p> <p>19 counsel, you're talking about house counsel Marc</p> <p>20 Fink?</p> <p>21 A. I've also had conversations with my</p> <p>22 personal counsel Mr. Sidney Gold.</p> <p>23 Q. In 2018?</p> <p>24 A. I did, yes. Mr. Gold has been my</p> <p>25 attorney for four years.</p>
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<p>1 what you spoke to Mr. Pipes about or was I right that</p> <p>2 in connection with -- in connection with the</p> <p>3 conversation about sexual harassment and those</p> <p>4 allegations your conversation with Mr. Pipes was</p> <p>5 general and kind of relegated to what we're seeing</p> <p>6 here in this letter; is that correct?</p> <p>7 A. No. I will --</p> <p>8 Q. Why isn't it correct? What else did</p> <p>9 you talk about?</p> <p>10 A. I'll try to explain this again.</p> <p>11 Q. What else did you talk about?</p> <p>12 A. What he said to me, from what I can</p> <p>13 best recall, at least on one occasion between --</p> <p>14 Q. That's all you can testify to is what</p> <p>15 you can best recall, Mr. Pipes. Mr. --</p> <p>16 A. Right, that's why I'm saying as best as</p> <p>17 I can recall so the written record reflects what I'm</p> <p>18 saying. As best as I can recall, from November 2nd,</p> <p>19 2018, until the end of 2018 there was at least one</p> <p>20 discussion that Mr. Pipes and I had where he said in</p> <p>21 a general manner, Mr. Roman -- calls me Gregg,</p> <p>22 whatever you want to go by -- these women have made</p> <p>23 sexual -- accusations against you that you have made</p> <p>24 unwanted sexual advances towards them and this is</p> <p>25 what we are going to do about it.</p>	<p>1 Q. I didn't ask you that. All right. So</p> <p>2 in 2018 did -- well, it says here that he finished</p> <p>3 his investigation yesterday, and since sent it on</p> <p>4 11/2 we can assume the investigation happened on</p> <p>5 11/1, correct?</p> <p>6 A. I don't know what happened with the</p> <p>7 investigation. I wasn't part of it.</p> <p>8 Q. So you didn't talk to anyone on 11/1?</p> <p>9 A. I don't know if I spoke to someone on</p> <p>10 11/1. I would have to see my phone records. I do</p> <p>11 remember that I spoke with counsel between October</p> <p>12 31st I believe, maybe it was 11/1 -- this is two</p> <p>13 years ago, Mr. Carson, long time ago.</p> <p>14 Q. Right.</p> <p>15 A. And with the -- by the time I got</p> <p>16 this -- I'll give you an example. Lisa Barbounis</p> <p>17 called me.</p> <p>18 Q. I don't need an example.</p> <p>19 A. No, you're asking me if I talked with</p> <p>20 anybody. I spoke with --</p> <p>21 Q. I'm asking you --</p> <p>22 A. -- Lisa Barbounis.</p> <p>23 Q. I'm not asking if you talked to anyone</p> <p>24 in the world. I'm asking whether you talked to</p> <p>25 anyone related to the instant investigation whereas</p>

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<p>1 -- so I'm asking if you had any conversations with anyone where you gave your side of the story on 11/1/2018.</p> <p>4 A. I don't know if it's 11/1, but maybe 11/2.</p> <p>6 Q. Sorry?</p> <p>7 A. I don't know on 11/1 or 11/2, but I did have a conversation with someone about these allegations, general allegations, on 11/1 or 11/2.</p> <p>10 Q. I'm asking you specifically, though, the -- so you understand --</p> <p>12 A. Specifically 11/1? I can't answer you, Mr. Carson. I don't remember.</p> <p>14 Q. Is that Marc Fink that you spoke to?</p> <p>15 A. I had a conversation with Marc Fink, in-house counsel, between October 31st and November 2nd. I don't know which exact day.</p> <p>18 Q. And did he talk to you about the specific -- I don't want to know what he said, but is that when you got into the specific allegations?</p> <p>21 A. Well, I need to ask counsel if I can answer that question.</p> <p>23 MR. CARSON: Can he answer?</p> <p>24 MR. GOLD: Conversation with Marc Fink, yeah, direct you not to answer the</p>	<p>1 factual evidence speaks for itself.</p> <p>2 Q. Well, did you acknowledge that? Is that true?</p> <p>4 A. Well, I didn't acknowledge that I had unacceptable conduct. What I acknowledged was that Mr. Pipes was in a difficult position because of the allegations that were made against me.</p> <p>8 Q. So this statement is not true then. You didn't do that.</p> <p>10 A. Well, let's go over it again. But you acknowledge that your conduct, whatever your intentions were, was not acceptable and put these employees in a difficult position. No, again, my conduct, according to the way that these three employees, Lisa Barbounis, Tricia McNulty, and Marnie Meyer O'Brien or O'Brien Meyer, whatever, said put Pipes in a difficult position, and if there was anything that they alleged I do -- if I smiled the wrong way, if I looked up, if I looked over, and they said that they thought it was unwelcoming and they went to him to complain, what am I going to say, I'm the manager of the organization and, you know what -- hold on, you know what, it's a smile, it's something else -- I wasn't part of the investigation. If they're saying I did something and now the president</p>
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<p>1 question.</p> <p>2 MR. CARSON: I'm not asking what he said, Mr. Gold. I'm just asking if that's -- if that was when he talked more specifically about the case.</p> <p>6 MR. GOLD: Can you read back the question?</p> <p>8 (The following was read back by the court reporter:</p> <p>9 Question, "And did he talk to you about the specific -- I don't want to know what he said. Is that when you got into the specific allegations?")</p> <p>14 MR. GOLD: I don't understand the question.</p> <p>17 MR. CARSON: Okay. I'll rephrase it.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. So you told -- so Mr. Pipes says that you told somebody that you felt -- that -- that you acknowledge your conduct, whatever your intentions, was not acceptable and put these employees in a difficult position, correct?</p> <p>25 A. That's what the letter -- I think the</p>	<p>1 of the organization is impacted by it, doesn't matter what I think. He's affected by it.</p> <p>3 Q. Mr. Roman --</p> <p>4 A. That's the way that it works.</p> <p>5 Q. Mr. Roman, did you acknowledge that your conduct was not acceptable?</p> <p>7 A. No, I don't know what conduct you're talking about, Mr. Carson. It's a general question.</p> <p>9 Q. Then the letter is wrong then. Then the letter is wrong, correct?</p> <p>11 A. It's not that the letter is wrong.</p> <p>12 Q. Well, it --</p> <p>13 A. The characterization --</p> <p>14 Q. -- it says that you acknowledged that, right?</p> <p>16 A. No, what I'm saying is is that I acknowledged in many conversations both then and afterwards that management practices that I was privy to and decisions that I made, not of a sexual nature, but a general management nature, were wrong --</p> <p>20 Q. Okay. Did you ever --</p> <p>22 A. -- but I never had any --</p> <p>23 Q. -- send a letter back to Daniel Pipes and explain to him that --</p> <p>25 THE COURT REPORTER: I can't hear</p>



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<p>1 you. Start the question over, please.</p> <p>2 BY MR. CARSON:</p> <p>3 Q. Did you respond to this letter and let</p> <p>4 Mr. Pipes know that this -- that the wording is off,</p> <p>5 because the wording says that you're acknowledging</p> <p>6 that -- I mean, look what it says. It says --</p> <p>7 A. Yeah, yeah, I see, I see --</p> <p>8 Q. It says you acknowledge that your --</p> <p>9 A. -- what it says.</p> <p>10 Q. Let me finish the question. It says</p> <p>11 you acknowledge that your conduct, whatever your</p> <p>12 intentions, was not acceptable. So I'm asking you,</p> <p>13 did you contact Mr. Pipes and tell him I don't agree</p> <p>14 with this letter?</p> <p>15 A. No, I didn't contact Mr. Pipes and tell</p> <p>16 him I disagree with the letter. I think that I had a</p> <p>17 response --</p> <p>18 Q. Did you -- did you --</p> <p>19 A. -- to the letter.</p> <p>20 Q. Did you -- do you agree with the second</p> <p>21 part, do you agree that your conduct put Lisa,</p> <p>22 Tricia, and Marnie in a difficult position?</p> <p>23 A. No, because there wasn't any conduct to</p> <p>24 put them in a difficult position. Look, Mr. Carson,</p> <p>25 you're trying to explain --</p>	<p>1 sentence; is that fair to say?</p> <p>2 A. No, it's not that I disagree with the</p> <p>3 sentence. I disagree with your characterization of</p> <p>4 the sentence.</p> <p>5 Q. Well, you think this sentence doesn't</p> <p>6 say that you put Lisa -- that you're acknowledging</p> <p>7 that you put Lisa, Tricia, and Marnie in a difficult</p> <p>8 position?</p> <p>9 A. May I ask you for the license to</p> <p>10 explain the paragraph so that you have the context of</p> <p>11 the sentence.</p> <p>12 Q. Well, let me just read it to you. Here</p> <p>13 is what I found. This is Dr. Pipes -- this is what</p> <p>14 Dr. Pipes is saying. He's "I", right?</p> <p>15 A. Okay. Before --</p> <p>16 Q. The "I" is Dr. Pipes.</p> <p>17 A. Before we get to you reading --</p> <p>18 Q. Just let me finish the question. The</p> <p>19 "I" is Dr. Pipes.</p> <p>20 A. I just want to ask you -- I want to ask</p> <p>21 you for clarity on something from your previous</p> <p>22 question.</p> <p>23 Q. Well --</p> <p>24 A. You'll read the sentence, okay, and if</p> <p>25 I can say, Mr. Carson, stop, and I'll explain what I</p>
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<p>1 Q. So you don't --</p> <p>2 A. I'm trying to give you --</p> <p>3 Q. So you don't agree with this --</p> <p>4 A. I'm trying to give you --</p> <p>5 THE COURT REPORTER: Excuse me.</p> <p>6 Please.</p> <p>7 BY MR. CARSON:</p> <p>8 Q. I know, but, Mr. Roman, just --</p> <p>9 THE COURT REPORTER: One at a</p> <p>10 time. Please.</p> <p>11 BY MR. CARSON:</p> <p>12 Q. -- answer the questions that I'm asking</p> <p>13 and let's just keep it moving so we can get out of</p> <p>14 here, man, it's Friday. So, like --</p> <p>15 A. I've got all night, Mr. Carson.</p> <p>16 Q. Yeah, I do, too, but, you know what I</p> <p>17 mean, we don't have to be here all night if we don't</p> <p>18 need to be.</p> <p>19 A. I'm trying to explain myself.</p> <p>20 Q. Mr. Roman, I promise, I'll give you the</p> <p>21 opportunity to answer -- put whatever information you</p> <p>22 want on the record before this is over, but --</p> <p>23 A. Okay.</p> <p>24 Q. It says here -- so the whole sentence</p> <p>25 you're -- you just -- you disagree with this</p>	<p>1 see as my interpretation of Mr. Pipes's words. Is</p> <p>2 that fair?</p> <p>3 Q. Do you agree, Mr. Roman, that the "I"</p> <p>4 here is Mr. Pipes?</p> <p>5 A. I do.</p> <p>6 Q. Okay. So here Dr. Pipes is saying here</p> <p>7 is what I found. Three women who work for you, Lisa,</p> <p>8 Tricia, and Marnie, say that you made unwanted sexual</p> <p>9 advances toward them. You maintain that you never</p> <p>10 made such advances and did not know they felt</p> <p>11 uncomfortable. But you acknowledge that your</p> <p>12 conduct, whatever your intentions were, was not</p> <p>13 acceptable and put these employees in a difficult</p> <p>14 position.</p> <p>15 So I'm just asking, do you agree with</p> <p>16 this paragraph or do you disagree with this</p> <p>17 paragraph?</p> <p>18 A. No, I disagree with this paragraph.</p> <p>19 Q. Okay. Would you like -- I'll give you</p> <p>20 the opportunity because I told you to, would you like</p> <p>21 to explain why?</p> <p>22 A. Yeah. Sure. Thank you very much. All</p> <p>23 right. So we have to go back to the previous</p> <p>24 paragraph to understand this paragraph.</p> <p>25 Q. Go ahead.</p>

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<p>1 A. As you know, there have been several 2 allegations of improper conduct directed against you. 3 Right? So we said beforehand earlier in the 4 deposition several allegations. Some say there was 5 sexual allegations, other are business professional 6 management organizations. Okay? Allegations. 7 The Middle East Forum takes these 8 allegations very seriously. Mr. Pipes is taking both 9 the allegations of a sexual nature and the 10 allegations of a nonsexual matter seriously. 11 Accordingly, I investigated this matter 12 yesterday, immediately upon learning of it. And we 13 heard in Mr. Pipes's testimony that he said that he 14 spoke with each employee in each of their offices. I 15 don't know what was said, I wasn't there, I was I 16 think traveling back to Philadelphia or something, 17 but he investigated with those employees. Okay? 18 Then it says here is what I found. 19 What he's saying is he found from his conversations 20 with those employees, maybe counsel was involved, I 21 don't know, three women who work for you, da da da da 22 da, say they -- unwanted -- that's the first 23 sentence. Second sentence, apologies. And what I am 24 saying is this. After these allegations both of a 25 managerial and of a sexual nature were made against</p>	<p>1 your intentions were, was not acceptable and put 2 these employees in a difficult position. What he 3 means by that sentence I'll never know, but my 4 interpretation of that sentence is the fact that he 5 has said that I acted like a drill sergeant, he said 6 that I asked people to work too late, he said that I 7 gave people too much work, he said that I should have 8 been nicer, and he never said that I wasn't nice to 9 female employees and he never said that I made sexual 10 advances beyond what's in this letter and there is 11 very very long documentation over three years where 12 he believes that I was too tough of a boss, that he 13 thinks that I took the way that I was when I was a 14 commander in the Israel defense forces and then I 15 went back into civilian life and tried to be somewhat 16 of a -- I don't know what the word would be, more of 17 like a disciplinarian than I would be someone a boss, 18 and whatever it was, however I spoke to employees, 19 like I said, could have smiled, could have said 20 hello, whatever it was, nothing was ever of a sexual 21 nature, Mr. Carson. It was always just because they 22 probably thought that I was too tough. And if you 23 look at the text messages and every other 24 communication from all of the clients you've 25 represented, Ms. Shikunov's clients, and specifically</p>
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<p>1 me, Marc Fink, in-house counsel, was charged with 2 investigating somewhat as -- I guess you would call 3 it as the detective, as in-house counsel, corporate 4 counsel, whatever you want -- of taking the 5 complaints that the women made to Mr. Pipes that then 6 Pipes conveyed to Fink, and this is probably privy, I 7 don't know about the conversations there, that's a 8 privileged conversation, and Fink went ahead and 9 talked to me. The contents of that conversation I 10 understand are either privileged or work product, I 11 don't know the proper classification. I'll defer to 12 counsel on that. Then what Pipes is doing is just 13 saying you maintain that you never made such advances 14 and did not know they felt uncomfortable. He's 15 saying what I believe I conveyed to counsel in a 16 privileged conversation. So whatever that conclusion 17 he's making there that he addresses to me, that's his 18 words, not mine. Okay? I never talked to Pipes 19 about this directly with specifics. I talked to 20 counsel, didn't talk to Pipes. So I can't comment on 21 what Daniel Pipes is thinking. I'm not Daniel Pipes. 22 Then the concluding sentence here, 23 which goes back to the first sentence where he says 24 several allegations, both professional and sexual, he 25 says but you acknowledge that your conduct, whatever</p>	<p>1 the men who work and worked at the Middle East Forum, 2 all say that I was too hard, and I learned from that, 3 I learned from that, I try to be a much nicer person 4 these days, I've done a lot of work on trying to 5 improve my management style, and even today I'm still 6 bound by the restrictions that Mr. Pipes -- some of 7 the restrictions that Mr. Pipes put on me in that 8 letter that you showed previously of what I'm allowed 9 and what I'm not allowed to do at the Middle East 10 Forum. That's what I meant by that. 11 Q. What about the next sentence? 12 A. What? 13 Q. What about the next sentence? You put 14 this in the context of calling yourself a social 15 junkie. What did you mean by that? 16 A. Well, I don't think I ever called 17 myself a social junkie. I don't remember saying 18 that. 19 Q. So you didn't say that you were a 20 social junkie who seeks constant social interaction? 21 A. I don't remember ever saying that, and 22 if I did say it, I don't know how he's taking it 23 because I didn't talk to him about it, I talked to 24 Mr. Fink. 25 Q. Well, you did receive this letter,</p>

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<p>1 though, right?</p> <p>2 A. It looks like I received it. It's</p> <p>3 addressed to me, it's copied to Marc Fink.</p> <p>4 Q. And you read it in November 2nd, 2018,</p> <p>5 so why didn't you respond and correct Mr. Pipes?</p> <p>6 A. Mr. Carson, it was like an avalanche</p> <p>7 coming down a mountain. Everyone who I considered to</p> <p>8 be my friend and my associate all of a sudden came</p> <p>9 out overnight after months of interactions, birthday</p> <p>10 parties, going out with social events, travel,</p> <p>11 whatever else, not one complaint was ever registered</p> <p>12 to me between the time any of your clients started</p> <p>13 working with MEF about me -- it was all about each</p> <p>14 other and them. I had to mediate between Marnie and</p> <p>15 Lisa, Marnie and Tricia, between Delaney and Matt,</p> <p>16 Matt and Tricia, there was all these interpersonal</p> <p>17 conflicts, and it's all reflected on the record, by</p> <p>18 the way, by all the discovery that you gave to the</p> <p>19 Middle East Forum. I have so much more knowledge now</p> <p>20 understanding the interpersonal dynamics of your</p> <p>21 clients and how they hated each other before November</p> <p>22 2nd, 2018. And then when all this is coming at you,</p> <p>23 this wave of complaints that are addressing you, at</p> <p>24 least the way I reacted was sort of fight or flight.</p> <p>25 Mr. Pipes, look, I just --</p>	<p>1 it might be hard to do that?</p> <p>2 A. Do what?</p> <p>3 Q. For a woman to report information that</p> <p>4 has a personal sexual context to it.</p> <p>5 A. Mr. Carson, I can and I can relate to</p> <p>6 that on a personal level.</p> <p>7 Q. Going back to the AIPAC conference, can</p> <p>8 you please explain what that is, briefly?</p> <p>9 A. What's what?</p> <p>10 Q. What is the AIPAC conference? Is that</p> <p>11 an annual conference held in Washington D.C.?</p> <p>12 A. Well, there's a few AIPAC conferences</p> <p>13 that take place.</p> <p>14 Q. Well, in 2018 --</p> <p>15 A. Some take place --</p> <p>16 Q. In 2018 the Middle East Forum attended</p> <p>17 an AIPAC conference sometime around March; is that</p> <p>18 correct?</p> <p>19 A. There was the American Israel Public</p> <p>20 Affairs policy conference that took place between</p> <p>21 March 3rd and March 6th or March 2nd and March 5th,</p> <p>22 if that's what you're referring to, yes.</p> <p>23 Q. Yeah, I'm going to try to get us</p> <p>24 through this quickly. So the AIPAC conference in</p> <p>25 March of 2018, did you attend that along with Matt</p>
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<p>1 Q. Did you --</p> <p>2 A. -- want to -- hold on. Hold on. Hold</p> <p>3 on. Mr. Pipes, look, I've got a job, I've got three</p> <p>4 kids that I have to worry about, I have to pay my</p> <p>5 rent, I got to do things -- whatever you're saying,</p> <p>6 there will be a time to address the veracity and the</p> <p>7 truthfulness and the honesty of what these people are</p> <p>8 saying about me, but right now I'm going to work with</p> <p>9 you to try to make this problem mitigate itself and</p> <p>10 I'll do whatever you need me to do, and I even</p> <p>11 offered my resignation, Mr. Carson, if that's what</p> <p>12 you need me to do, and the conclusion at the end of</p> <p>13 the day when all this was over is that I was to go</p> <p>14 and start my own organization until Lisa Barbounis</p> <p>15 went back on her word, reneged on her complaints, and</p> <p>16 said I should come back to work with her as if though</p> <p>17 nothing ever happened. That's what happened,</p> <p>18 Mr. Carson.</p> <p>19 Q. Do you -- do you understand why women</p> <p>20 might come -- not come forward and report sexual</p> <p>21 harassment the day it happens?</p> <p>22 A. Mr. Carson, I'm not those women, so I</p> <p>23 can't comment on something that someone else might</p> <p>24 think.</p> <p>25 Q. Well, can you think of any reasons why</p>	<p>1 Bennett and Patricia McNulty and Lisa Barbounis and</p> <p>2 Marnie Meyer?</p> <p>3 A. Yes, and there was other people who</p> <p>4 attended with us as well.</p> <p>5 Q. Understood. And you -- it's my</p> <p>6 understanding that you and Matt Bennett booked the</p> <p>7 Airbnb; is that right?</p> <p>8 A. I actually think it was Lisa that</p> <p>9 booked the Airbnb.</p> <p>10 Q. For you and Matt Bennett, correct?</p> <p>11 A. Yes, and she also booked her own hotel</p> <p>12 room for her and Tricia and for Marnie after Tricia</p> <p>13 asked if Lisa and Marnie could go.</p> <p>14 Q. Okay. And I believe that you went to</p> <p>15 the AIPAC conference over the -- over a weekend in</p> <p>16 March; is that right?</p> <p>17 A. Well, you would have to tell me when it</p> <p>18 is, but usually it's Saturday -- or Friday to Tuesday</p> <p>19 depending on the year.</p> <p>20 Q. And that first Friday during that AIPAC</p> <p>21 conference did the -- during that first AIPAC</p> <p>22 conference in March of 2018 did the Middle East Forum</p> <p>23 hold an event?</p> <p>24 A. No.</p> <p>25 Q. A dinner?</p>

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<p>1 A. No.</p> <p>2 Q. Is that Saturday?</p> <p>3 A. I don't think so, no.</p> <p>4 Q. Did the Middle East Forum sponsor or</p> <p>5 hold a dinner for donors during that conference?</p> <p>6 A. Not at the conference; in parallel to</p> <p>7 the conference.</p> <p>8 Q. Okay. Where was that dinner held, do</p> <p>9 you remember?</p> <p>10 A. In Chinatown Gallery Place at a</p> <p>11 restaurant called Cuba Libre.</p> <p>12 Q. The -- that dinner, it was a dinner</p> <p>13 that Ms. McNulty helped organize; is that correct?</p> <p>14 A. The donor dinner, yes, she organized it</p> <p>15 with Matt Bennett.</p> <p>16 Q. And that was part of her job as the --</p> <p>17 working with Matt Bennett who at the time Matt</p> <p>18 Bennett was the director of development, correct?</p> <p>19 A. Correct.</p> <p>20 Q. And Ms. McNulty was sort of -- reported</p> <p>21 to Matt Bennett at that time; is that correct?</p> <p>22 A. What do you mean reported to?</p> <p>23 Q. He was her boss.</p> <p>24 A. Yeah, well, she really had sort of four</p> <p>25 people that she was involved with. She worked with</p>	<p>1 not the others.</p> <p>2 Q. Well, you were Lisa's and Patricia</p> <p>3 McNulty's, too --</p> <p>4 A. Yeah, but my understanding is you were</p> <p>5 asking about who managed Tricia McNulty, so I was</p> <p>6 answering that question.</p> <p>7 Q. Okay. So if we put it in a hierarchy,</p> <p>8 you and then Matt Bennett and then Ms. McNulty,</p> <p>9 correct?</p> <p>10 A. Yeah, but, again, McNulty reported to</p> <p>11 other people besides me and Bennett.</p> <p>12 Q. Okay. So the night that that dinner</p> <p>13 was held, at the end of the night tell me where you</p> <p>14 guys went.</p> <p>15 A. So Tricia McNulty had just been on a</p> <p>16 cruise I think. She was on vacation -- yeah, it was</p> <p>17 really crazy because we had asked her to schedule the</p> <p>18 entire dinner before she went on vacation, and there</p> <p>19 was an e-mail that went from Tricia to me, which I</p> <p>20 think was sent like February 23rd, February 24th, I</p> <p>21 forget the exact date she was on vacation, but she</p> <p>22 sent me an e-mail before vacation and she said here</p> <p>23 is all the plans, here is everything else, and I said</p> <p>24 to her who is going to manage this, and she said,</p> <p>25 well, I will, but I need more people, and I said what</p>
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<p>1 Daniel Pipes, she worked with Matt Bennett, she</p> <p>2 worked with Marnie Meyer -- well, actually five</p> <p>3 people. Marnie Meyer, myself. And then she also had</p> <p>4 the responsibility of liaising with the different</p> <p>5 volunteers and the different hosts of events, so she</p> <p>6 sort of like was a board liaison, too. So if you</p> <p>7 want to consider that a direct report, I don't know</p> <p>8 about the management structure -- but it was pretty</p> <p>9 informal.</p> <p>10 Q. You were their -- all their boss,</p> <p>11 though, correct?</p> <p>12 A. No, I was not.</p> <p>13 Q. You were not Matt Bennett's boss?</p> <p>14 A. No, I was.</p> <p>15 Q. You were not Marnie Meyer's boss?</p> <p>16 A. No, I was.</p> <p>17 Q. In March of 2018.</p> <p>18 A. I was, yes.</p> <p>19 Q. You were Lisa Barbounis's boss?</p> <p>20 A. Yes, but I didn't mention her.</p> <p>21 Q. By boss I mean supervisor, boss, same</p> <p>22 thing.</p> <p>23 A. Yeah, but, like I said, I didn't</p> <p>24 mention her, so you asked me if I was all of their</p> <p>25 bosses, and I was Marnie and I was Matt's boss but</p>	<p>1 more people do you need, and she said, well, what</p> <p>2 about Marnie and Lisa, and I said, okay, you make the</p> <p>3 decision what's best for you. I really believed in</p> <p>4 having people decide what's best for them,</p> <p>5 self-empowerment. And I said if it's just you, get a</p> <p>6 hotel; if it's you and Marnie and Lisa, get an</p> <p>7 Airbnb. Not my Airbnb; that was just me and Matt.</p> <p>8 Okay? And then she booked her hotel, I think -- I</p> <p>9 told her to stay at the Hilton, we had a good deal</p> <p>10 there, so she had her own hotel, that was her</p> <p>11 accommodations and lodging, she was supposed to stay</p> <p>12 with Marnie and Lisa, they had agreed to stay</p> <p>13 together for some reason. I said if you need more</p> <p>14 than one, go ahead. And then we arrived in D.C. -- I</p> <p>15 was in meetings all day. Can I ask you a question,</p> <p>16 Mr. Carson, just about specifics? Has MEF provided</p> <p>17 you or has my counsel provided you with the calendar</p> <p>18 from 2018?</p> <p>19 Q. I don't know. But --</p> <p>20 A. The reason it matters is because that</p> <p>21 calendar was arranged by Tricia McNulty.</p> <p>22 Q. Okay.</p> <p>23 A. So I don't want to give you an answer</p> <p>24 that is like, well, you know, we were supposed to go</p> <p>25 here and then it turns out I was somewhere else. I'm</p>



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<p>1 trying to give it to you best of my recollection.</p> <p>2 Q. Let me fast forward this a little bit.</p> <p>3 At the end of the night did --</p> <p>4 A. All this is important because it gives</p> <p>5 context to what was planned.</p> <p>6 Q. I understand. I understand. But let</p> <p>7 me just --</p> <p>8 A. So --</p> <p>9 Q. So at the end of the night did you and</p> <p>10 Matt Bennett and Ms. McNulty and Ms. Meyer and Ms.</p> <p>11 Barbounis return to the Airbnb that you and Matt had</p> <p>12 booked?</p> <p>13 A. No, because there was other events</p> <p>14 between the dinner and the end of the night.</p> <p>15 Q. Yeah, I -- at the end of the night I</p> <p>16 said.</p> <p>17 A. Well, not at the end of the night. At</p> <p>18 the end of the night Tricia McNulty slept in the</p> <p>19 Airbnb, but we didn't immediately go back to the</p> <p>20 Airbnb.</p> <p>21 Q. I know. I understand. I'm not worried</p> <p>22 about where you guys went and had a couple drinks in</p> <p>23 between dinner and Airbnb, I'm trying --</p> <p>24 A. It wasn't a couple drinks, Mr. Carson.</p> <p>25 Tricia McNulty was drunk beyond belief.</p>	<p>1 Q. Okay.</p> <p>2 A. But I do remember --</p> <p>3 Q. Is it possible --</p> <p>4 A. -- that I had -- I don't know if it's</p> <p>5 possible or not. I don't want to answer something</p> <p>6 that's not accurate.</p> <p>7 Q. Well, is it possible that you took the</p> <p>8 same Uber or do you specifically recall that you</p> <p>9 didn't?</p> <p>10 A. No, I don't remember who I took an Uber</p> <p>11 with, Mr. Carson.</p> <p>12 Q. Okay. So now you're all back at the</p> <p>13 Airbnb. What time is it when you get there?</p> <p>14 A. I think the Uber records indicate --</p> <p>15 you have to see, but the bars -- see, what happened</p> <p>16 -- that's why I wanted to mention beforehand, that --</p> <p>17 after the dinner and then after, Marnie Meyer and</p> <p>18 Lisa and Tricia had booked our attendance at four or</p> <p>19 five events that took place after the dinner. I have</p> <p>20 an e-mail, and we can provide this if this is</p> <p>21 something that will help, Lisa Barbounis and Tricia</p> <p>22 McNulty were exchanging e-mails with EJ Kimball, who</p> <p>23 used to work for MEF, where Lisa asks EJ what's this</p> <p>24 event CAMERA, Committee for Accurate Middle East</p> <p>25 Reporting in America, and EJ says I don't know but</p>
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<p>1 Q. Okay. Now, at the end of the night</p> <p>2 when you allege that she was drunk beyond belief did</p> <p>3 you all return to the Airbnb that you and Mr. Bennett</p> <p>4 had booked?</p> <p>5 A. No, Matt -- Matt and I had, I think, we</p> <p>6 went to get pizza, they were waiting outside the</p> <p>7 entrance, or we may have been in the same car, I'm</p> <p>8 not sure, I think probably Lisa has the Uber records</p> <p>9 or they might be somewhere, but there was different</p> <p>10 times that different people showed up to the Airbnb</p> <p>11 because there was multiple rides.</p> <p>12 Q. But you and Lisa --</p> <p>13 A. So I -- I don't remember if I arrived</p> <p>14 with those three and Bennett. I do remember that I</p> <p>15 was with, like, seven other people who were there and</p> <p>16 they stayed -- few of them stayed there until the</p> <p>17 next day, too. So it wasn't just the four of them.</p> <p>18 Q. But then you guys all did go back to</p> <p>19 your place at the Airbnb, right?</p> <p>20 A. At different times, staggered.</p> <p>21 Q. But you and Lisa and Mr. Bennett and</p> <p>22 Ms. McNulty all took the same Uber back to it,</p> <p>23 correct?</p> <p>24 A. I don't remember if we were in the same</p> <p>25 Uber.</p>	<p>1 they have top shelf liquor, I'll be there, and then</p> <p>2 Lisa responds count me in. And there is another</p> <p>3 e-mail which talks about --</p> <p>4 Q. Mr. Bennett, you can -- you and your</p> <p>5 counsel can submit whatever documents you want and --</p> <p>6 A. I'm Mr. Roman, not Mr. Bennett.</p> <p>7 Q. Sorry. Mr. Roman. Thank you.</p> <p>8 A. But the reason I'm saying all this is</p> <p>9 important is because the way in which they returned,</p> <p>10 some people were at the hotels and were at the bars,</p> <p>11 other people were at the Airbnb, and at the end there</p> <p>12 were so many people at the Airbnb I don't remember</p> <p>13 who was there and when they were there but I do</p> <p>14 remember --</p> <p>15 Q. I just want to know what time you got</p> <p>16 back, what time --</p> <p>17 A. I can't give you an accurate time.</p> <p>18 Q. Approximately.</p> <p>19 A. It was after the -- after that we were</p> <p>20 at three or four or five bars -- we were at some bars</p> <p>21 together, we were at some bars that we separated --</p> <p>22 Q. Was it around 2 in the morning?</p> <p>23 A. -- it was really mix.</p> <p>24 THE COURT REPORTER: I can't hear</p> <p>25 you when you're talking at the same</p>

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<p>1 time. Please.</p> <p>2 BY MR. CARSON:</p> <p>3 Q. Was it around 2 in the morning?</p> <p>4 A. I don't know.</p> <p>5 Q. Okay. Fine. So now you're back at the</p> <p>6 Airbnb. You're there, Matt Bennett is there,</p> <p>7 correct?</p> <p>8 A. In addition to about eight other</p> <p>9 people, yes.</p> <p>10 Q. Is Lisa Barbounis one of those eight</p> <p>11 people?</p> <p>12 A. Yeah, I believe she was there.</p> <p>13 Q. And Patricia McNulty is one of those</p> <p>14 eight people?</p> <p>15 A. I believe she was there, yeah, she</p> <p>16 slept there that night.</p> <p>17 Q. Marnie Meyer is one of those eight</p> <p>18 people?</p> <p>19 A. She also slept there.</p> <p>20 Q. Was there someone named Raheem Kassam?</p> <p>21 A. Yeah, Raheem was there.</p> <p>22 Q. Was there some people from Pinsker</p> <p>23 there?</p> <p>24 A. Can you be more specific?</p> <p>25 Q. No. I don't know how to be. Were</p>	<p>1 you order some pizza into the room or did you go get</p> <p>2 pizza on the way back there? How did that happen?</p> <p>3 A. Raheem Kassam ordered pizza.</p> <p>4 Q. Okay. And were you sitting on the</p> <p>5 couch next to Lisa Barbounis and Patricia McNulty?</p> <p>6 A. When?</p> <p>7 Q. When you got back to the Airbnb.</p> <p>8 A. No, I don't think so.</p> <p>9 Q. At no time did you sit on the couch</p> <p>10 with them.</p> <p>11 A. I may have, but the exact time you're</p> <p>12 asking me if I did, I had conversations with the</p> <p>13 students, I played the game of Battleship with them</p> <p>14 -- we actually got this box of Battleship from one of</p> <p>15 the bars which was one of these board game bars,</p> <p>16 brought it back to the condo, whatever it was, and I</p> <p>17 remember that some people were taking pictures</p> <p>18 because the view was over Logan -- not Logan --</p> <p>19 anyways, one of the circles on Massachusetts Avenue,</p> <p>20 and then we were playing a game of Battleship, you</p> <p>21 know, the board game Battleship, at the dining room</p> <p>22 table, and the entire room was this, like, purple</p> <p>23 couch that extended like this, like an oval. The TV</p> <p>24 was to the left. There was a table for chess that</p> <p>25 came around. There was a dining room table which</p>
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<p>1 there Pinsker people there?</p> <p>2 A. Yes. Would you like the names of the</p> <p>3 people who were there?</p> <p>4 Q. If you know their names, you're welcome</p> <p>5 to say them for the record.</p> <p>6 A. Sure. Elliot Miller, Jonathan Hunter,</p> <p>7 a guy named Ryan, I don't remember his last name,</p> <p>8 Yosef or Yusef, guy named Steve Shimel [ph] was</p> <p>9 there. I want to say -- there was two or three</p> <p>10 others, they go to Oxford and Cambridge, okay,</p> <p>11 they're students, that are involved with this</p> <p>12 organization called the Pinsker Centre, but there was</p> <p>13 -- must have been at least 14 or 15 people there.</p> <p>14 Q. And you started smoking marijuana?</p> <p>15 A. No, I smoked cigarettes at that time.</p> <p>16 Q. Do you smoke marijuana?</p> <p>17 A. Now, no.</p> <p>18 Q. Knowing that there is nothing wrong</p> <p>19 with it because it just got legalized in New Jersey</p> <p>20 and legalized in 15 other states?</p> <p>21 A. No, you asked me if I smoke marijuana</p> <p>22 now. I said no.</p> <p>23 Q. At that time did you?</p> <p>24 A. I have smoked marijuana in the past.</p> <p>25 Q. So now you're all back, I think -- did</p>	<p>1 divided -- there was no walls, but it divided the</p> <p>2 kitchen area from the living room, but everything was</p> <p>3 all together. So I had this very intense game of</p> <p>4 Battleship against Elliot Miller, and -- I don't even</p> <p>5 know where he is these days, but that's what I</p> <p>6 remember. And then I also remember rolling</p> <p>7 cigarettes because the Brits, they don't know how to</p> <p>8 roll cigarettes, they're -- I don't smoke anymore,</p> <p>9 but doesn't matter. And then I was rolling the</p> <p>10 cigarettes and I would go outside to the balcony --</p> <p>11 it was cold, man. It was really cold. That's what I</p> <p>12 remember. And then there was a point where it was</p> <p>13 getting late, I said everybody's got to go, we're</p> <p>14 going to sleep -- because at AIPAC I had a meeting at</p> <p>15 8 a.m. the next day --</p> <p>16 Q. Did you whisper that in Ms. McNulty's</p> <p>17 ear?</p> <p>18 A. Did I whisper what -- I didn't whisper</p> <p>19 anything. I don't whisper.</p> <p>20 Q. That everyone had to go?</p> <p>21 A. I'm a pretty --</p> <p>22 THE COURT REPORTER: I can't hear</p> <p>23 you. I can't hear you. Can you repeat</p> <p>24 that question?</p> <p>25 BY MR. CARSON:</p>

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<p>1 Q. Did you whisper that in Ms. McNulty's</p> <p>2 ear?</p> <p>3 A. No, Mr. Carson, I don't whisper, I'm</p> <p>4 always told -- one of the complaints that Mr. Pipes</p> <p>5 said is that I'm too loud.</p> <p>6 Q. So you --</p> <p>7 A. So I don't -- I don't whisper into</p> <p>8 people's ears, no.</p> <p>9 Q. Did you yell into her ear then?</p> <p>10 A. No, I -- that would not be nice if I</p> <p>11 yelled in someone's ear. I don't yell in people's</p> <p>12 ear.</p> <p>13 Q. Did you tell her that everyone should</p> <p>14 go, it should just be the two of you there?</p> <p>15 A. No, I never said that.</p> <p>16 Q. Did you pick her up by her butt and put</p> <p>17 her on your lap?</p> <p>18 A. No, I've never touched Ms. McNulty in</p> <p>19 such a fashion. I've actually never probably ever</p> <p>20 touched Ms. McNulty, so that accusation is</p> <p>21 outlandish.</p> <p>22 Q. Well, she made the accusation against</p> <p>23 you. Is she lying?</p> <p>24 A. Mr. Carson, Tricia McNulty has made</p> <p>25 seven different versions of an allegation of some</p>	<p>1 you saying they're lying about?</p> <p>2 THE COURT REPORTER: I can't hear</p> <p>3 your questions because you're talking at</p> <p>4 the same time that he is. Please repeat</p> <p>5 it.</p> <p>6 BY MR. CARSON:</p> <p>7 Q. My question is, so are they both lying</p> <p>8 then?</p> <p>9 A. What are you talking about? What are</p> <p>10 they -- what are you saying they're lying about?</p> <p>11 Q. Ms. Barbounis and Ms. McNulty have</p> <p>12 consistently alleged since November of 2018 that you</p> <p>13 were on the couch between them, that you put your arm</p> <p>14 around Ms. Barbounis, that you put your other arm</p> <p>15 around Ms. McNulty, you pulled them both toward you,</p> <p>16 that Ms. McNulty -- you picked her up by her butt and</p> <p>17 put her on your lap and started whispering in her ear</p> <p>18 that everyone should leave and it should just be the</p> <p>19 two of you in the room. They both allege that. Are</p> <p>20 they both lying?</p> <p>21 A. Mr. Carson --</p> <p>22 Q. Yes or no.</p> <p>23 A. -- first of all -- first of all, what</p> <p>24 you're alleging has been told in this case, in</p> <p>25 multiple cases, seven different ways.</p>
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<p>1 nature which started one way when you sent the letter</p> <p>2 to us on June 20th and it morphed into this story on</p> <p>3 and on and on to this day that she -- not this day,</p> <p>4 but that she gave another version some -- two weeks</p> <p>5 ago she testified. Ms. McNulty is lying, there is no</p> <p>6 other word to say it, when she says that I in one way</p> <p>7 or another may have touched her on some couch that I</p> <p>8 don't remember even sitting on. So, yes, she's</p> <p>9 lying.</p> <p>10 Q. Well, is Ms. Barbounis lying, too,</p> <p>11 then?</p> <p>12 A. Ms. Barbounis is a whole other case of</p> <p>13 lying. Ms. Barbounis --</p> <p>14 Q. Well, she said --</p> <p>15 A. -- according to --</p> <p>16 Q. -- that she saw you on the couch next</p> <p>17 to Ms. McNulty and she said --</p> <p>18 A. Ms. Barbounis says a lot of things. I</p> <p>19 can't testify to the veracity of what Ms. Barbounis</p> <p>20 sees. She sees a lot of things that have already</p> <p>21 been disproven, Mr. Carson, so, no --</p> <p>22 Q. So they're --</p> <p>23 A. -- I don't --</p> <p>24 Q. So they're both lying.</p> <p>25 A. Well, what are they lying -- what are</p>	<p>1 Q. Okay.</p> <p>2 A. So that's the first thing. So if you</p> <p>3 want to address each allegation how it's changed</p> <p>4 seven times --</p> <p>5 Q. Yeah --</p> <p>6 A. That's one thing.</p> <p>7 Q. -- I would be happy to do that, but can</p> <p>8 you just answer the question?</p> <p>9 A. Sure. But the answer to those --</p> <p>10 Q. Were they lying?</p> <p>11 A. -- seven different stories is they</p> <p>12 lied, they lied, they lied, they lied, they lied,</p> <p>13 they lied, they lied, seven times. Yes, they lied.</p> <p>14 Q. So what -- so tell me these seven</p> <p>15 different stories. When did you hear the first one?</p> <p>16 A. Well, it's not that I have to see them,</p> <p>17 it's we have to go through the complaints. You filed</p> <p>18 four complaints, in Yonchek, in Brady, in Barbounis</p> <p>19 --</p> <p>20 Q. We're only here today to talk about one</p> <p>21 case.</p> <p>22 A. No, but you're asking about the lies.</p> <p>23 You tell the story a different way in each of your</p> <p>24 complaints. We have to address each lie if you would</p> <p>25 like to really get into the specificity of it.</p>

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<p>1 Q. I think -- Mr. Roman --</p> <p>2 A. So you say it one --</p> <p>3 Q. Just slow down --</p> <p>4 A. I'm just trying to answer your</p> <p>5 question, Mr. Carson. I'm sorry. I won't answer if</p> <p>6 you don't want me to.</p> <p>7 Q. I'm going to give you an opportunity to</p> <p>8 explain yourself. Slow down for a second.</p> <p>9 You testified that -- from when until</p> <p>10 when has the story morphed. Give me the first date</p> <p>11 of the -- the date of the first story and give me the</p> <p>12 date of the last story and then we'll fill in the</p> <p>13 blanks once we have a date range that we can talk</p> <p>14 about. So please --</p> <p>15 A. Sure.</p> <p>16 Q. -- give me the date the first story was</p> <p>17 alleged.</p> <p>18 A. So I wasn't there when the first story</p> <p>19 was told, so I can't tell you the exact --</p> <p>20 Q. Approximate date.</p> <p>21 A. -- date. So I think there was text</p> <p>22 messages between Lisa and Tricia from around the time</p> <p>23 that Lisa started her relationship with Danny Tommo,</p> <p>24 October 23rd, 2018, and they start talking about a</p> <p>25 Gregg plan, which Lisa Barbounis acknowledged in her</p>	<p>1 Q. So -- and you testified that that story</p> <p>2 has morphed and that there has been --</p> <p>3 A. Oh yeah.</p> <p>4 Q. -- eight versions of the story, so --</p> <p>5 A. Seven versions, not eight. Seven.</p> <p>6 Q. Seven. And so the first -- and you</p> <p>7 don't -- I'm not going to hold you to the number.</p> <p>8 A. I think it's seven. It might be eight,</p> <p>9 it might be six.</p> <p>10 Q. Approximately. So --</p> <p>11 A. Sevenish or so.</p> <p>12 Q. -- the first -- the first one that</p> <p>13 you're aware of occurred around October of 2018; is</p> <p>14 that right?</p> <p>15 A. No, I said when Lisa Barbounis revealed</p> <p>16 that she had started an affair with Danny Tommo to</p> <p>17 Tricia McNulty, that's the first time.</p> <p>18 Q. The first time --</p> <p>19 A. I think it was October --</p> <p>20 Q. -- that you heard the story.</p> <p>21 A. -- 23rd or 24th -- I didn't hear her</p> <p>22 story; that's after reviewing the litigation and all</p> <p>23 of the discovery that you produced, that's when it</p> <p>24 starts making sense of this lie.</p> <p>25 Q. That's not what I'm -- that's not what</p>
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<p>1 testimony given at her deposition last week --</p> <p>2 Q. That's not what --</p> <p>3 A. -- or two weeks ago -- I'm getting to</p> <p>4 this. Because what they're doing is --</p> <p>5 Q. That's not what we're talking about.</p> <p>6 I'm --</p> <p>7 A. Mr. Carson, you're asking me when the</p> <p>8 lies started. I'm trying to give you the context.</p> <p>9 Q. I'm asking -- I don't -- I don't want</p> <p>10 context. I just want a date so we -- and then --</p> <p>11 A. I'm giving you the date, but I got to</p> <p>12 identify the specific thing so I don't --</p> <p>13 Q. No, you don't.</p> <p>14 A. -- mess it up.</p> <p>15 Q. No, you don't, because I -- you're</p> <p>16 going to get there. All right? Just we got to take</p> <p>17 it slowly so that the record is clear.</p> <p>18 A. I'm going real slow, real slow.</p> <p>19 Q. So you're saying the date of the first</p> <p>20 story -- and we're specifically talking about AIPAC</p> <p>21 right now and what happened on that couch, what did</p> <p>22 or did not happen on that couch. Okay? That's what</p> <p>23 we're talking about right now. And everything that</p> <p>24 we're discussing relates to that couch right now.</p> <p>25 A. Right.</p>	<p>1 I'm asking you. I'm -- you said that the story of</p> <p>2 how they described the incident has morphed seven</p> <p>3 times around.</p> <p>4 A. Correct.</p> <p>5 Q. So I'm wondering when the first version</p> <p>6 of the story was told. Is that around --</p> <p>7 A. The first --</p> <p>8 Q. -- October 2018?</p> <p>9 A. The first version was told when Tricia</p> <p>10 McNulty concocted it in a text message to Lisa</p> <p>11 Barbounis around October 23rd.</p> <p>12 Q. All right. Concocted it? Concocted?</p> <p>13 A. Yeah.</p> <p>14 Q. Okay. Give me a second. Let me write</p> <p>15 it down. When Tricia concocted it in a text to Lisa</p> <p>16 Barbounis in October 2018. Okay.</p> <p>17 A. Not October, like --</p> <p>18 Q. Around.</p> <p>19 A. -- October twenty -- because if you're</p> <p>20 saying October, there is other events that took place</p> <p>21 in October --</p> <p>22 Q. It's not a test.</p> <p>23 A. -- that was a different version of</p> <p>24 the story --</p> <p>25 Q. You can say in or around.</p>



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<p>1 A. -- than from what they originally said.</p> <p>2 THE COURT REPORTER: One at a</p> <p>3 time, please.</p> <p>4 BY MR. CARSON:</p> <p>5 Q. It's not a test. We're going to say in</p> <p>6 or around. We have to be able to make -- we have to</p> <p>7 be able to outline this, so --</p> <p>8 A. I'm trying to outline this, Mr. Carson.</p> <p>9 You're saying --</p> <p>10 Q. No, no, no.</p> <p>11 A. -- in or around. I'm saying --</p> <p>12 Q. Wait for a question.</p> <p>13 A. -- October 23rd.</p> <p>14 Q. You got to wait for a question.</p> <p>15 A. I'm waiting.</p> <p>16 Q. All right. The first version of this</p> <p>17 concocted, quote/unquote, version, quote/unquote,</p> <p>18 allegation, whatever, it was when Tricia texted it to</p> <p>19 Lisa Barbounis sometime around October 2018. Okay?</p> <p>20 Is that fair?</p> <p>21 A. Well, there is multiple references to</p> <p>22 conversations --</p> <p>23 Q. You got to just answer the question yes</p> <p>24 or no. Is it fair -- if it's not, then correct me.</p> <p>25 A. I'm correcting you. There's --</p>	<p>1 Q. Mr. Roman, I need a date. I just need</p> <p>2 a date. I don't need to know what's around the date.</p> <p>3 Just give me a date. Give me a date.</p> <p>4 A. Like I said, I'm trying to tell you --</p> <p>5 Q. Just give me a date.</p> <p>6 A. -- that I think --</p> <p>7 Q. The next words out of your mouth need</p> <p>8 to be a month and a year.</p> <p>9 A. I think the affair started October 23rd</p> <p>10 and I think that's when the text messages started.</p> <p>11 Q. So then why did you say wrong when I</p> <p>12 just said in or around October 2018?</p> <p>13 A. Because it's not specific enough. We</p> <p>14 have to be as specific as possible.</p> <p>15 Q. No, we don't. We can be general. It's</p> <p>16 easier.</p> <p>17 A. Mr. Carson, I don't want that -- I</p> <p>18 don't want that to be my testimony.</p> <p>19 Q. Mr. Roman, stop --</p> <p>20 A. I want to have specific --</p> <p>21 Q. -- interrupting me.</p> <p>22 A. -- testimony.</p> <p>23 Q. The court reporter can't take two</p> <p>24 people talking at the same time.</p> <p>25 A. Okay.</p>
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<p>1 Q. I'm looking for a date. When?</p> <p>2 A. So I give you a date.</p> <p>3 Q. Okay. When?</p> <p>4 A. I said that the first version that I'm</p> <p>5 aware of or that I remember was based on text</p> <p>6 messages that I reviewed that you have produced</p> <p>7 between Tricia and Lisa around the time that Lisa</p> <p>8 started having an affair with Danny Tommo --</p> <p>9 Q. That was in -- that was well into 2019,</p> <p>10 so --</p> <p>11 A. No, no, that --</p> <p>12 THE COURT REPORTER: I can't hear</p> <p>13 you. I can't hear you.</p> <p>14 THE WITNESS: Mr. Carson, Lisa</p> <p>15 Barbounis testified to starting an</p> <p>16 affair with Danny Tommo on October 23rd,</p> <p>17 2018. You should recollect what your</p> <p>18 own client said about her affairs.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. Sorry, I don't, but that's fine.</p> <p>21 A. So -- well, how are we doing -- we got</p> <p>22 to be accurate with these dates, so --</p> <p>23 Q. Just give me a date.</p> <p>24 A. -- I'm trying to give you the accurate</p> <p>25 --</p>	<p>1 Q. October 23rd, 2018. Done.</p> <p>2 A. I think. I think October 23rd.</p> <p>3 Q. When's the last one, the most recent</p> <p>4 one. Give me a month and a year.</p> <p>5 A. When -- either when Lisa or Tricia gave</p> <p>6 their testimony during their deposition, that's the</p> <p>7 last time we heard a different version of the story.</p> <p>8 Q. Okay. During the dep. Okay. And</p> <p>9 you're saying in between those there were five more</p> <p>10 about?</p> <p>11 A. I would say that there was two versions</p> <p>12 of the story, one told by Lisa and one told by</p> <p>13 Tricia, when they were examined by Dr. Barbara Ziv,</p> <p>14 the forensic psychiatrist that examined both of them</p> <p>15 a few months ago. Lisa told one version of the</p> <p>16 story, Tricia told another version of the story.</p> <p>17 Q. Of AIPAC.</p> <p>18 A. Of AIPAC, that's what we're talking</p> <p>19 about, this alleged --</p> <p>20 Q. Of the couch.</p> <p>21 A. -- couch incident that never happened.</p> <p>22 Q. Of what happened on the couch or what</p> <p>23 didn't happen on the couch at the AIPAC conference,</p> <p>24 correct?</p> <p>25 A. What didn't happen at the couch at the</p>

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<p>1 AIPAC conference.</p> <p>2 Q. We're talking about the same thing,</p> <p>3 Mr. Roman, so --</p> <p>4 A. We're not, Mr. Carson. We're not</p> <p>5 talking about the same thing.</p> <p>6 Q. Okay. We're not. We'll pretend like</p> <p>7 we're not. So -- so then you said another version is</p> <p>8 a version that Patricia provided to Dr. Ziv and</p> <p>9 another version is a version that Lisa provided to</p> <p>10 Dr. Ziv?</p> <p>11 A. Correct. Now we're at five.</p> <p>12 Q. No, we're actually at four now, but</p> <p>13 that's okay.</p> <p>14 A. Well, no, we have the text message, we</p> <p>15 have --</p> <p>16 Q. Text message --</p> <p>17 A. -- one testimony from Lisa --</p> <p>18 Q. Right.</p> <p>19 A. -- we have another testimony from Lisa</p> <p>20 -- excuse me, from Tricia, that's three. We have</p> <p>21 Tricia's story that she told Dr. Ziv. We have Lisa's</p> <p>22 story that she told Dr. Ziv. So that's five.</p> <p>23 Q. Okay. It would be easier if you just</p> <p>24 let me be -- you answer the questions and let me</p> <p>25 organize it. Okay?</p>	<p>1 27th, 2019, in the Eastern District of Pennsylvania.</p> <p>2 Q. Okay. And I'll represent to you I</p> <p>3 copied and pasted all the complaints, so regardless</p> <p>4 of the fact that there is multiple complaints, it's</p> <p>5 all the same, it's all one big story.</p> <p>6 A. Can you just clarify -- just to</p> <p>7 understand.</p> <p>8 Q. Never changed a word of the complaint.</p> <p>9 Every time I file a new complaint I just copy and</p> <p>10 paste --</p> <p>11 A. You took the same complaint in</p> <p>12 Barbounis, you put it in McNulty, you put it in</p> <p>13 Yonchek, you put it in Brady?</p> <p>14 Q. No, that's not -- what I'm saying is</p> <p>15 that Ms. McNulty's filed more than one complaint.</p> <p>16 She's filed a complaint and an amended complaint,</p> <p>17 another amended complaint. I'm saying all the</p> <p>18 accounts in those three complaints are the same.</p> <p>19 A. Okay. Well --</p> <p>20 Q. So we're going to say the complaint is</p> <p>21 one more story.</p> <p>22 A. It's not -- it's not, though, because</p> <p>23 what you wrote in your civil complaint is different</p> <p>24 from what is written in the handwritten complaint</p> <p>25 that either Barbounis or McNulty gave to the EEOC in</p>
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<p>1 A. I just want to make sure my testimony</p> <p>2 is accurate.</p> <p>3 Q. The first one I have is from October</p> <p>4 23rd, 2018, sometime around, in a text message. All</p> <p>5 right? The last one I have is when Lisa provided</p> <p>6 testimony at a deposition. In between those two I</p> <p>7 have Patricia providing testimony -- or not</p> <p>8 testimony. Patricia providing a statement to Dr. Ziv</p> <p>9 and then I also have Lisa providing a statement to</p> <p>10 Dr. Ziv, and I believe the last one, the sixth one</p> <p>11 that you're testifying about, is Ms. McNulty</p> <p>12 providing testimony at deposition, correct?</p> <p>13 A. We're at five and now we have two more</p> <p>14 but there is actually probably five more now that</p> <p>15 you're helping me jog my memory.</p> <p>16 Q. So --</p> <p>17 A. We're at about ten right now. So we're</p> <p>18 at five. I'm going to give you another five.</p> <p>19 Q. We're at five. Just slow down.</p> <p>20 A. I'm sorry.</p> <p>21 Q. Just give me one more, just one more</p> <p>22 right now.</p> <p>23 A. Okay. So the next one that I recall is</p> <p>24 Tricia McNulty's accounting of what she says happened</p> <p>25 at AIPAC in her complaint that was filed October</p>	<p>1 or around June 5th of 2019.</p> <p>2 Q. That's called a charge.</p> <p>3 A. So the charge and the complaint -- so</p> <p>4 she files a complaint that has one version, she files</p> <p>5 a charge that has a different version, two different</p> <p>6 versions within two weeks of each other. There is</p> <p>7 more versions of her story than I knew about. This</p> <p>8 is -- you're really enlightening here.</p> <p>9 Q. We're going to take a look at them and</p> <p>10 you're going to explain this. All right? I'm just</p> <p>11 --</p> <p>12 A. Well, I can't explain anything that</p> <p>13 didn't happen, Mr. Carson.</p> <p>14 Q. Well, we're going to -- just -- let me</p> <p>15 just lead the way and I'll --</p> <p>16 A. All right. Sorry. My apologies.</p> <p>17 Q. You're doing fine. Just keep going.</p> <p>18 All right. So the EEOC charge is another version.</p> <p>19 So we have one, two, three, four, five, six, this is</p> <p>20 -- that's seven, the charge is number seven. Do you</p> <p>21 -- are there any others you want to say -- can I</p> <p>22 suggest one.</p> <p>23 A. Well, I think there is a version that</p> <p>24 Ms. McNulty gave to Mr. Pipes.</p> <p>25 Q. That's the one I was about to suggest.</p>

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<p>1 A. That's eight.</p> <p>2 Q. So the letter -- the letter to</p> <p>3 Mr. Pipes. Okay?</p> <p>4 A. No, no, I didn't say -- you're putting</p> <p>5 words in my mouth, Mr. Carson.</p> <p>6 Q. Well, I was about to -- it's this right</p> <p>7 here. This is the letter to Mr. Pipes.</p> <p>8 A. Not this. This would be another</p> <p>9 version.</p> <p>10 Q. Okay. So -- so you're going to --</p> <p>11 well, let's just -- the letter to Mr. Pipes is one.</p> <p>12 Okay?</p> <p>13 A. There's three or four more versions.</p> <p>14 We haven't gone over all the versions yet.</p> <p>15 Q. Is it fair to say the letter to</p> <p>16 Mr. Pipes is one of them; okay?</p> <p>17 A. One, but not the last one.</p> <p>18 Q. Not the last one. Okay. The letter to</p> <p>19 Mr. Pipes --</p> <p>20 A. There is a difference --</p> <p>21 Q. I'll call him Dr. Pipes. And --</p> <p>22 A. He actually prefers Mr. Pipes. I mean,</p> <p>23 I know he's got the doctor but --</p> <p>24 Q. I don't know. I deal with --</p> <p>25 A. But this is not -- this is not the one</p>	<p>1 text messages in this case, so I don't know what she</p> <p>2 said to Marnie. I have what we have produced by</p> <p>3 Marnie Meyer's counsel in Meyer versus MEF, but there</p> <p>4 has been no evidence or limited amount of evidence</p> <p>5 produced by McNulty versus MEF. I think there is a</p> <p>6 motion for contempt against Ms. McNulty that we're</p> <p>7 waiting to see what Judge Brody is going to say, so I</p> <p>8 can't answer that right now.</p> <p>9 THE WITNESS: Can we take a break?</p> <p>10 I got to get some water. Is that okay?</p> <p>11 MR. CARSON: Absolutely.</p> <p>12 THE WITNESS: Okay. All right.</p> <p>13 Take five minutes?</p> <p>14 THE VIDEO SPECIALIST: We're off</p> <p>15 the record. It's 4:31 p.m. Eastern.</p> <p>16 THE WITNESS: Thank you,</p> <p>17 Mr. Carson.</p> <p>18 (A brief recess was taken.)</p> <p>19 THE VIDEO SPECIALIST: We're back</p> <p>20 on the record. It's 4:43 p.m. Eastern.</p> <p>21 THE WITNESS: Can you guys see me</p> <p>22 okay?</p> <p>23 THE VIDEO SPECIALIST: Yes.</p> <p>24 BY MR. CARSON:</p> <p>25 Q. All right. So, Mr. Roman, screen share</p>
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<p>1 between October 23rd and this -- it says November</p> <p>2 4th. I also understand that --</p> <p>3 Q. There is a statement on 11/1.</p> <p>4 A. On 11/1 and there is another version</p> <p>5 that McNulty tells Meyer or Lisa, maybe she changed</p> <p>6 her version from --</p> <p>7 Q. We don't have Ms. Meyer's statement</p> <p>8 here. Can we just --</p> <p>9 A. No, but you're asking me about every</p> <p>10 one that took place. What we do have is the text</p> <p>11 messages between Meyer and McNulty that was produced</p> <p>12 by your coworker Erica Shikunov --</p> <p>13 Q. I don't think she --</p> <p>14 A. -- that has -- no, but -- I'm not</p> <p>15 saying -- she has another story of how that went</p> <p>16 through, so we must be at like 12 or 13 right now.</p> <p>17 Q. Right now we're at one, two, three</p> <p>18 four, five, six, seven, eight, right now we're at</p> <p>19 nine.</p> <p>20 A. Nine.</p> <p>21 Q. I don't have -- I mean, if you want me</p> <p>22 to say the version she gave to Ms. -- to Ms. Meyer,</p> <p>23 is that what you want to say?</p> <p>24 A. I don't know. Mr. Carson, McNulty</p> <p>25 hasn't turned over any discovery except for a few</p>	<p>1 -- all right. So do you see this right here,</p> <p>2 Mr. Roman? See it?</p> <p>3 A. Yeah.</p> <p>4 Q. I'm going to represent to you this is</p> <p>5 the EEOC charge that was filed at the EEOC, it's been</p> <p>6 turned over and marked LBEEOC docs. This is the dual</p> <p>7 filing letter --</p> <p>8 A. Actually it looks like a -- looks like</p> <p>9 a different document than the one we have from when</p> <p>10 you first sent it --</p> <p>11 Q. Yeah, it's not. It's the exact same --</p> <p>12 I mean, I don't know what you have, but this is what</p> <p>13 was filed with the EEOC. This is the second charge</p> <p>14 of discrimination. You can tell because of the date.</p> <p>15 A. Second charge.</p> <p>16 Q. What?</p> <p>17 A. So this is the second charge.</p> <p>18 Q. This is the second charge for</p> <p>19 retaliation because of the lawsuits you guys filed</p> <p>20 against her.</p> <p>21 A. Yeah, I understand that, but what I was</p> <p>22 saying is that there -- the first charge was in June</p> <p>23 -- you sent that -- there you go. That's June.</p> <p>24 Okay.</p> <p>25 Q. So let's just take a look at how it's</p>

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<p>1 explained -- I mean, look, this is Lisa Barbounis's</p> <p>2 charge. Lisa Barbounis wrote in her charge in the</p> <p>3 material facts section Airbnb -- see AIPAC</p> <p>4 conference?</p> <p>5 A. It's spelled incorrectly.</p> <p>6 Q. Sorry. AI, right?</p> <p>7 A. Uh-huh.</p> <p>8 Q. So see it says respondent Gregg Roman</p> <p>9 sat on the couch between charging party Lisa</p> <p>10 Barbounis and coworker Patricia McNulty?</p> <p>11 A. I can read -- yes, that's what it says.</p> <p>12 Q. All right. So --</p> <p>13 A. It's kind of hard to see with the blue.</p> <p>14 Q. What?</p> <p>15 A. You highlighted it in blue and I</p> <p>16 couldn't see the text when you highlighted it.</p> <p>17 Q. It ends right here. Right? This is</p> <p>18 the part that explains the couch. It goes from 20 to</p> <p>19 26. Okay? Do you see that?</p> <p>20 A. Go up a little bit. Yeah, okay.</p> <p>21 Q. 20 to 26.</p> <p>22 A. Okay.</p> <p>23 Q. Did you read that?</p> <p>24 A. 27 has AIPAC in it, too.</p> <p>25 Q. 27 is just a legal conclusion.</p>	<p>1 assault is, okay, so it's part legal conclusion, part</p> <p>2 -- but I don't think it continues. There is no more</p> <p>3 description of the couch incident in this charge.</p> <p>4 Okay? Fair enough?</p> <p>5 A. No, the alleged couch incident is how</p> <p>6 it should be represented.</p> <p>7 Q. What?</p> <p>8 A. You're saying there was a couch</p> <p>9 incident. I'm not acknowledging that there was a</p> <p>10 couch incident.</p> <p>11 Q. We know -- Mr. Roman, no one is trying</p> <p>12 to trick you into acknowledging --</p> <p>13 A. You just said couch incident, so I</p> <p>14 don't want to have the record be incorrect.</p> <p>15 Q. Let me just -- I'm going to describe it</p> <p>16 as the couch incident. The couch incident refers to</p> <p>17 what may or may never have happened on the couch. My</p> <p>18 client alleges it happened, Mr. Roman alleges it</p> <p>19 didn't happen. We know. This is what we call a</p> <p>20 material fact in dispute. We understand that. No</p> <p>21 one is trying to trick you into saying it happened.</p> <p>22 I'm just calling it the incident, just -- all right?</p> <p>23 That's what -- fair enough?</p> <p>24 A. Not --</p> <p>25 Q. When I say the incident I mean what --</p>
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<p>1 A. I'm not -- I don't understand the law,</p> <p>2 but I can start from 20 and read down to twenty --</p> <p>3 Q. I mean, I will suggest to you that this</p> <p>4 is just my characterization of the facts that my</p> <p>5 client alleged.</p> <p>6 A. Exactly, Mr. Carson. Exactly.</p> <p>7 Q. Right. I made a legal conclusion on</p> <p>8 behalf of my client.</p> <p>9 A. No, but that's what I'm saying, it's</p> <p>10 your conclusion of one of at least 12 different</p> <p>11 versions of what McNulty has said to private people</p> <p>12 on the public record in different areas. All of</p> <p>13 these different representations of what she says</p> <p>14 happened that evening --</p> <p>15 Q. Right. So --</p> <p>16 A. -- are just -- are just -- they really</p> <p>17 make what the allegations confusing -- first of all,</p> <p>18 I'm saying they didn't happen, but, beyond that, she</p> <p>19 said -- she tells so many different versions in so</p> <p>20 many different forums --</p> <p>21 Q. Let me -- I understand. You said that</p> <p>22 already. That's why we just made a list. So let --</p> <p>23 now we're going to look at what you're talking about.</p> <p>24 So I'll represent to you that this -- this part is</p> <p>25 not a legal conclusion, the calling it a sexual</p>	<p>1 what you allege didn't happen is fine. We can call</p> <p>2 that the incident. Okay? When I say incident, I'm</p> <p>3 alleging -- what I mean by that is what Mr. Roman</p> <p>4 alleges did not happen on the couch that Ms. McNulty</p> <p>5 alleges did. That's what that --</p> <p>6 A. Correct, did not happen on the couch.</p> <p>7 Q. Okay. So this is her characterization</p> <p>8 of what happened on the couch filed at the EEOC,</p> <p>9 right? That's one of the times you said her story</p> <p>10 changed?</p> <p>11 A. Well, actually, it doesn't start at 20;</p> <p>12 it goes before 20. The whole story -- 18 -- is there</p> <p>13 something in 17?</p> <p>14 Q. Let's just make it easy and just</p> <p>15 relegate it to the couch --</p> <p>16 A. Mr. Carson, you're showing me a</p> <p>17 document that's 31 pages long --</p> <p>18 Q. This says -- this says exactly what you</p> <p>19 already testified to. Respondent and Matt Bennett</p> <p>20 booked an Airbnb in D.C. Lisa Barbounis had a hotel</p> <p>21 room. The other female employees including Barbounis</p> <p>22 also had a hotel room.</p> <p>23 A. Yeah, but the thing is is that you</p> <p>24 write in your first complaint against me that I</p> <p>25 forced McNulty to go to Washington D.C. You said</p>



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<p>1 that I trafficked her there. So, again, you have a</p> <p>2 representation here that's different from a</p> <p>3 representation that you made in October that's</p> <p>4 different from another representation that your</p> <p>5 client made two weeks ago.</p> <p>6 Q. Mr. Roman --</p> <p>7 A. So I don't know which one we're talking</p> <p>8 about here. If this is like -- if you're asking me</p> <p>9 to comment on this version --</p> <p>10 Q. Yeah, no --</p> <p>11 A. -- okay, fine.</p> <p>12 Q. That's what we're looking at. We're</p> <p>13 looking at a charge.</p> <p>14 A. Right.</p> <p>15 Q. Right?</p> <p>16 A. But it's just there's so many different</p> <p>17 versions of this, Mr. Carson.</p> <p>18 Q. But we've heard you say that --</p> <p>19 A. I don't know what you want.</p> <p>20 Q. We've heard you say that. We actually</p> <p>21 listed the number of versions that you allege are out</p> <p>22 there and that you --</p> <p>23 A. I'm not alleging it. You have -- the</p> <p>24 records have showed me. It's --</p> <p>25 Q. Right.</p>	<p>1 a handwritten complaint that I think -- I think she</p> <p>2 maybe --</p> <p>3 Q. This? This?</p> <p>4 A. I don't know. I'm talking about</p> <p>5 McNulty's complaint, not Barbounis's. There is a</p> <p>6 handwritten complaint that McNulty filled out -- am I</p> <p>7 allowed to ask counsel -- is that okay if I ask</p> <p>8 counsel something?</p> <p>9 Q. No.</p> <p>10 A. Not to tell me something, but if we</p> <p>11 have a document that I'm referring to and I can say,</p> <p>12 hey, counsel, can you get that document, can he do</p> <p>13 that?</p> <p>14 Q. If they want to jump in and say what</p> <p>15 you're talking about, it's fine, I can pull it up.</p> <p>16 A. Okay. So there is this document that I</p> <p>17 reviewed I think like a day or two ago and it was a</p> <p>18 handwritten --</p> <p>19 Q. Did it look like this? Did it say</p> <p>20 charge of discrimination?</p> <p>21 A. There was a few. There is the McNulty</p> <p>22 one and there's the Barbounis one. Okay? But this</p> <p>23 is specifically McNulty's recollection of the alleged</p> <p>24 couch imbroglio and it says something in there that's</p> <p>25 different --</p>
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<p>1 A. -- a material fact not in dispute.</p> <p>2 Q. But what I'm going to show you is that</p> <p>3 they're all the same version, Mr. Roman, but, like,</p> <p>4 you know --</p> <p>5 A. You can show me whatever you want,</p> <p>6 Mr. Carson, but --</p> <p>7 Q. But this is --</p> <p>8 A. -- I'm just telling you --</p> <p>9 Q. -- the version that you --</p> <p>10 A. -- there's so many stories.</p> <p>11 Q. -- that you said that my client made,</p> <p>12 which she did, to the EEOC on June --</p> <p>13 A. That's not what I'm talking about.</p> <p>14 Q. It's one of the ones you listed, Mr.</p> <p>15 Roman.</p> <p>16 A. One of them but not the one I was</p> <p>17 specifically referring to --</p> <p>18 Q. It's one of the -- it's one, two,</p> <p>19 three, four, five, six, seven, eight, nine, ten, it's</p> <p>20 one of the ten that you came up with.</p> <p>21 A. One of ten.</p> <p>22 Q. You said there is ten different</p> <p>23 versions. This is one of them.</p> <p>24 A. There is this -- the one -- the one in</p> <p>25 this specific one that I'm talking about, is there is</p>	<p>1 Q. What does it say?</p> <p>2 A. -- from this. Can I ask counsel to get</p> <p>3 that document so I can be specific?</p> <p>4 Q. What does it say that's different?</p> <p>5 A. It says there -- let's go back -- let's</p> <p>6 -- let me read 20 through 28 and I'll tell you what's</p> <p>7 different. And then I want to read the one that we</p> <p>8 were talking about. Can I just ask counsel to get</p> <p>9 that for me? Is that okay, Mr. Carson?</p> <p>10 Q. If they know what you're talking about,</p> <p>11 they're welcome to jump in and say what it is.</p> <p>12 A. Okay. Can I do a -- without breaking</p> <p>13 privilege I'm going to ask Mr. Gold --</p> <p>14 THE WITNESS: There is a document</p> <p>15 that's a handwritten allegation,</p> <p>16 Mr. Gold --</p> <p>17 MR. GOLD: Uh-huh.</p> <p>18 THE WITNESS: -- that I may have</p> <p>19 read and you were aware that I read</p> <p>20 yesterday, two days ago, you know what</p> <p>21 I'm talking about, Mr. Gold?</p> <p>22 MR. GOLD: Talking about the</p> <p>23 charge of discrimination that was filed</p> <p>24 with the commission?</p> <p>25 THE WITNESS: The handwritten one.</p>

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<p>1 There was one that Mr. Carson typed up 2 and sent -- 3 MR. GOLD: Right. 4 THE WITNESS: There's a 5 handwritten one either from Barbounis or 6 McNulty. Do you have that? 7 MR. GOLD: Matt, can you pull that 8 up? 9 THE WITNESS: Either Matt or Bill 10 Rieser, do you guys have that? 11 (Simultaneous speakers.) 12 THE WITNESS: I can't hear you. 13 THE COURT REPORTER: I can't hear 14 you at all. 15 MR. GOLD: It's the charge that 16 was filed -- can you hear me now? 17 THE COURT REPORTER: Yes. Thank 18 you. 19 MR. GOLD: It's the charge that 20 was filed with the EEOC back in June -- 21 on June 7th, 2019. 22 THE WITNESS: Is that McNulty or 23 Barbounis? 24 MR. GOLD: I think it's Barbounis. 25 THE WITNESS: So do we have that,</p>	<p>1 is a dual filing, this is the -- 2 MR. GOLD: Keep going. 3 MR. CARSON: This is the entry of 4 appearance, this is the typed charge -- 5 MR. GOLD: Yeah, this looks like 6 it right here. Go ahead. Something 7 about escaping -- go ahead, let's see 8 what we got here. 9 MR. CARSON: I think I know what 10 you're talking about. Here -- I mean, I 11 just gave you a chance to read it, but 12 just take your time and read it slower. 13 MR. GOLD: Why don't you read this 14 document, Mr. Roman, see if this is the 15 document you're referring to. 16 BY MR. CARSON: 17 Q. So number -- so I'm not starting at the 18 dinner because I don't -- I mean, I think those facts 19 are probably not as material as what happened on the 20 couch. So respondent proceeded to put his arm -- 21 A. What allegedly happened on the couch. 22 Q. The incident that may or may not have 23 happened. 24 Respondent Gregg Roman sat on the couch 25 between charging party Lisa Barbounis and coworker</p>
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<p>1 Mr. Carson? 2 (Simultaneous speakers.) 3 THE COURT REPORTER: Sorry. 4 Everyone is talking at the same time 5 again. 6 (Simultaneous speakers.) 7 MR. GOLD: Mr. Carson typed up the 8 actual charge. Here it is right here. 9 That's not -- this is it. Here is what 10 you're talking about. Correct? 11 THE WITNESS: Yeah. So it's in, 12 like, the little -- it's in the thing 13 here, I think in the little sheet -- 14 MR. GOLD: Yeah, keep going down. 15 You'll see -- then there's a letter from 16 Mr. Carson to the commission. Keep 17 going. Keep going. Keep going. Keep 18 going. 19 THE WITNESS: There is nothing 20 there. 21 MR. GOLD: Yeah, this is not the 22 -- this is not the charge. Looks like a 23 right to sue letter. Yeah, it's a right 24 to sue letter, it's not the document. 25 MR. CARSON: The dismissal, this</p>	<p>1 Ms. McNulty. Respondent Gregg Roman proceeded to put 2 his arms around both charging party Lisa Barbounis 3 and coworker Patricia -- 4 THE COURT REPORTER: Please. You 5 have to slow down. 6 MR. CARSON: Sorry. 7 BY MR. CARSON: 8 Q. Respondent Gregg Roman grabbed coworker 9 Patricia McNulty by her upper thigh and violently 10 yanked coworker Patricia McNulty onto his lap. 11 Respondent Gregg Roman then began whispering 12 inappropriate sexual advances in coworker Patricia 13 McNulty's ear. Charging party Lisa Barbounis was 14 present and witnessed this violent and aggressive 15 sexual assault. Coworker Patricia McNulty tried to 16 pull away from respondent Gregg Roman who resisted 17 coworker McNulty -- McNulty's attempts to escape from 18 respondent Gregg Roman's grip. Coworker McNulty had 19 to fight to get away. Once coworker McNulty was able 20 to get away she left the room and entered the kitchen 21 area. Thereafter charging party witnessed respondent 22 Roman leave the room and go upstairs. He did not 23 return again -- downstairs again. 24 MR. GOLD: Is that the document? 25 THE WITNESS: Well, that's one</p>

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<p>1 version, yeah.</p> <p>2 MR. CARSON: This document -- for</p> <p>3 the record, this document is EEO --</p> <p>4 LBEEOC Docs 1 through 31, and we'll make</p> <p>5 that Roman 4.</p> <p>6 THE WITNESS: Yeah.</p> <p>7 Mr. Carson, there is a very simple</p> <p>8 reason why this cannot be true.</p> <p>9 BY MR. CARSON:</p> <p>10 Q. Okay.</p> <p>11 A. The layout of the way Ms. McNulty --</p> <p>12 I'm sorry, this is Ms. Barbounis alleging this, not</p> <p>13 McNulty --</p> <p>14 Q. Well --</p> <p>15 A. -- right?</p> <p>16 Q. -- yeah, I mean it's -- yeah.</p> <p>17 A. But I don't understand why you would</p> <p>18 include something that -- what McNulty said in</p> <p>19 Barbounis's allegations. Is this Barbounis's</p> <p>20 representation of McNulty or McNulty's representation</p> <p>21 of Barbounis?</p> <p>22 Q. Let me answer with a question. If you</p> <p>23 were discriminating against black people and you</p> <p>24 called one black person the N word in front of</p> <p>25 another black person, wouldn't that be discrimination</p>	<p>1 THE COURT REPORTER: I'm sorry --</p> <p>2 MR. CARSON: -- that are not</p> <p>3 proper --</p> <p>4 THE COURT REPORTER: You guys have</p> <p>5 to -- I know Mr. Gold was saying</p> <p>6 something but I couldn't hear him. You</p> <p>7 have to talk one at a time, please.</p> <p>8 MR. CARSON: For the record,</p> <p>9 Mr. Gold instructed the witness not to</p> <p>10 answer the question --</p> <p>11 MR. GOLD: Because it was a</p> <p>12 hypothetical question about African</p> <p>13 Americans, but go ahead. And Mr. --</p> <p>14 THE WITNESS: Mr. Carson's sound</p> <p>15 got cut.</p> <p>16 MR. GOLD: -- Mr. Carson told me</p> <p>17 to add it to my list, which I will do.</p> <p>18 THE WITNESS: I can't hear Mr.</p> <p>19 Carson.</p> <p>20 THE COURT REPORTER: I can't hear</p> <p>21 him either.</p> <p>22 THE WITNESS: Mr. Carson, your</p> <p>23 sound is off. Your microphone is off.</p> <p>24 MR. CARSON: Is it on now?</p> <p>25 THE WITNESS: Yeah, yeah, now I</p>
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<p>1 against both of them?</p> <p>2 A. Mr. --</p> <p>3 MR. GOLD: Hypothetical question,</p> <p>4 Mr. Roman, I'm not going to let you</p> <p>5 answer the question.</p> <p>6 THE COURT REPORTER: Sorry, Mr.</p> <p>7 Gold, can you repeat that?</p> <p>8 MR. GOLD: Hypothetical question.</p> <p>9 I'm directing him not to answer the</p> <p>10 question.</p> <p>11 BY MR. CARSON:</p> <p>12 Q. Mr. Roman, it would be discriminating</p> <p>13 against both of them, correct?</p> <p>14 MR. GOLD: Same objection. Direct</p> <p>15 him not to answer.</p> <p>16 MR. CARSON: You can't -- first of</p> <p>17 all, you can't tell someone not to</p> <p>18 answer based on the fact that it's a</p> <p>19 hypothetical. That's not a reason to</p> <p>20 tell him not to answer. But if you --</p> <p>21 look, I'm going to file a motion with</p> <p>22 Judge Wolson already because of this</p> <p>23 deposition. So if you want to add that</p> <p>24 to my list of things that you're doing</p> <p>25 --</p>	<p>1 can hear you.</p> <p>2 BY MR. CARSON:</p> <p>3 Q. So when you subject a female -- if you</p> <p>4 subjected a female employee to sexual harassment in</p> <p>5 front of another female employee, it's sexual</p> <p>6 harassment of both of them; do you understand that?</p> <p>7 A. Mr. Carson, I didn't subject anyone to</p> <p>8 sexual harassment.</p> <p>9 Q. But you understand that concept,</p> <p>10 correct?</p> <p>11 A. What concept?</p> <p>12 Q. That sexual harassment could be</p> <p>13 witnessing another member of your protected class</p> <p>14 being subjected to discrimination based on their</p> <p>15 gender.</p> <p>16 MR. CAVALIER: Object to form.</p> <p>17 THE WITNESS: Mr. Carson, I don't</p> <p>18 understand the question.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. Well, you asked why there is an</p> <p>21 allegation involving McNulty in a charge for Lisa</p> <p>22 Barbounis, and I'm trying to help you understand with</p> <p>23 my questions. If Ms. Barbounis witnessed you</p> <p>24 sexually assault a coworker, that could be sexual</p> <p>25 harassment for both of them, that's -- do you</p>

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<p>1 understand that?</p> <p>2 A. No.</p> <p>3 MR. CAVALIER: Object to form.</p> <p>4 MR. CARSON: Okay. That's fine.</p> <p>5 BY MR. CARSON:</p> <p>6 Q. But that's --</p> <p>7 THE COURT REPORTER: Sorry. Who</p> <p>8 was objecting?</p> <p>9 MR. CAVALIER: Cavalier.</p> <p>10 MR. GOLD: No one is objecting,</p> <p>11 got right to the next question.</p> <p>12 Mr. Carson, maybe you should</p> <p>13 consider teaching a course in employment</p> <p>14 discrimination next year at law school.</p> <p>15 MR. CARSON: Thank you. Maybe I</p> <p>16 will.</p> <p>17 BY MR. CARSON:</p> <p>18 Q. The --</p> <p>19 A. Your sound went off again. Your sound</p> <p>20 went off again.</p> <p>21 Q. All right. So let's get back to it.</p> <p>22 So -- sorry, you guys are now watching a movie. This</p> <p>23 is --</p> <p>24 A. What movie.</p> <p>25 Q. I don't know. Dolly Parton apparently.</p>	<p>1 away. She left the room and entered the kitchen</p> <p>2 area. There is no two rooms. There is one room. We</p> <p>3 should get blueprints from this -- and I'm sure you</p> <p>4 can get it from Airbnb. There is no two rooms.</p> <p>5 Okay?</p> <p>6 Q. So --</p> <p>7 A. One room.</p> <p>8 Q. -- does it say -- Mr. Roman --</p> <p>9 A. That's one.</p> <p>10 Q. -- does it say she went into another</p> <p>11 room?</p> <p>12 A. It says she left the room, so if you're</p> <p>13 in a room and you leave it, there by logic has to be</p> <p>14 a second room. Okay?</p> <p>15 Q. Because of that you're saying it's</p> <p>16 impossible for this --</p> <p>17 A. No, I'm not saying that, I'm saying</p> <p>18 that's one of five reasons why, besides my own</p> <p>19 personal knowledge that it didn't happen, this is</p> <p>20 incorrect.</p> <p>21 Q. Mr. Roman, let me ask you a question</p> <p>22 real quick about that. Was there --</p> <p>23 A. I have four more, Mr. Carson.</p> <p>24 Q. Was there a kitchen in the Airbnb?</p> <p>25 A. There might be a kitchen, I -- there</p>
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<p>1 Let me get back to this -- here, let me stop so you</p> <p>2 guys don't need to see my calendar.</p> <p>3 All right. So, anyway, my -- look,</p> <p>4 let's get -- let's get through this. So, look, the</p> <p>5 charge of discrimination which is Roman Exhibit 4,</p> <p>6 which is EEOC Docs 1 through 31, you do see this</p> <p>7 description which is between Paragraphs 20 and, say,</p> <p>8 27, right, Mr. Roman? You see it. That's all I'm</p> <p>9 asking.</p> <p>10 A. Right, what I said was there is no way</p> <p>11 at all it could be accurate because of the -- the</p> <p>12 facts that are alleged in the charge -- one of 12</p> <p>13 charges here, but this specific charge of 12, can't</p> <p>14 be correct. There is no way --</p> <p>15 Q. Why?</p> <p>16 A. -- at all, unless all of a sudden a</p> <p>17 building in Washington D.C. has morphed magically</p> <p>18 from one way to another, there is no way this could</p> <p>19 be true. There is at least five things I can point</p> <p>20 out to you that make this incorrect.</p> <p>21 Q. Just take one at a time and point them</p> <p>22 out.</p> <p>23 A. Sure. Number one, the kitchen that's</p> <p>24 mentioned here, what does it say? It says -- hold</p> <p>25 on. Where is the kitchen. Here. Was able to get</p>	<p>1 was a kitchen area, yes, but wasn't in a separate</p> <p>2 room.</p> <p>3 Q. There was a kitchen area?</p> <p>4 A. There was a kitchen area which was part</p> <p>5 of the living room area.</p> <p>6 Q. Isn't that the language in the</p> <p>7 complaint, kitchen area?</p> <p>8 A. No, it's not. It's was able to --</p> <p>9 Q. See what I highlighted?</p> <p>10 A. -- get away -- it was able to get away,</p> <p>11 she left the room, so it's three parts, so what she's</p> <p>12 alleging is there is this couch, she's getting up,</p> <p>13 she's leaving the couch, and then it says she left</p> <p>14 the room. So if the kitchen and living room are in</p> <p>15 the same room, sorry, but the way that it's written</p> <p>16 here, it couldn't have happened.</p> <p>17 Q. Okay.</p> <p>18 A. No way that could have happened.</p> <p>19 Q. Okay. I mean, if you think that's</p> <p>20 relevant testimony, then it's now on the record for</p> <p>21 you.</p> <p>22 A. It's not what I think is relevant; I'm</p> <p>23 just representing to you my recollection and the</p> <p>24 blueprints of the place where I the individual with</p> <p>25 Matt Bennett and Steve Shimel [ph] and Elliot Miller</p>



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<p>1 and Jonathan Hunter and everyone else who was there</p> <p>2 will testify if you call them to testify, I think</p> <p>3 they're on our initial disclosures, I think we're</p> <p>4 having them testify, if they come testify, they will</p> <p>5 testify there was never a different room between a</p> <p>6 kitchen and the living room. It was all one room.</p> <p>7 So this statement, Number 26 --</p> <p>8 Q. You said that one now. What's the</p> <p>9 other --</p> <p>10 A. -- at least half of it is completely</p> <p>11 inaccurate. Number two --</p> <p>12 Q. Because it says left the room, it means</p> <p>13 that it couldn't have happened.</p> <p>14 A. Right. Number two --</p> <p>15 Q. Okay.</p> <p>16 A. Let's look at Number 27. Okay? It</p> <p>17 says that this individual is yanked across the couch.</p> <p>18 Okay?</p> <p>19 Q. Where does it say yanked across the</p> <p>20 couch.</p> <p>21 A. Right there, right there, when he</p> <p>22 violently yanked. That's what you allege. That's</p> <p>23 what your client alleges. This is Lisa alleging it.</p> <p>24 Q. Can you -- can you talk about -- can</p> <p>25 you say what you're talking about?</p>	<p>1 A. So what you're saying is is that</p> <p>2 there's two -- I guess we can't really do a</p> <p>3 stenographic representation of where two people are,</p> <p>4 but the laws of physics -- and I'm not -- I might be,</p> <p>5 like, you know, a former wrestler or whatever, but to</p> <p>6 lift somebody up to yank across the couch would mean</p> <p>7 that there would have to be contact with someone</p> <p>8 else, the actual positioning on the other side --</p> <p>9 Mr. Carson, I'm not that able, I got a bad back, I</p> <p>10 got a bad other side. There is no way that I would</p> <p>11 have the strength even to do what's being alleged</p> <p>12 there. Okay? I don't have the --</p> <p>13 Q. Okay.</p> <p>14 A. -- physical acumen to be able to do</p> <p>15 such a thing. Now, beyond that, the third reason why</p> <p>16 this didn't happen according to at least what's in</p> <p>17 this charge --</p> <p>18 Q. Well, wait. Just to get it straight,</p> <p>19 Mr. Roman, number one is because it says left the</p> <p>20 room and number two is because you don't have the</p> <p>21 physical acumen to yank someone --</p> <p>22 A. No, not just that, it would be</p> <p>23 physically impossible -- the laws of physics would</p> <p>24 not allow one person be lifted from one side across</p> <p>25 the other side without contact going on someone else,</p>
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<p>1 A. Number 27. Okay? What it says there</p> <p>2 says -- this allegation, this incorrect allegation,</p> <p>3 is when he -- when he yanked across the couch. Okay?</p> <p>4 So you have yanked across the couch. What you're</p> <p>5 saying is is that there is -- Barbounis you're saying</p> <p>6 is on one side, you're saying McNulty is on the other</p> <p>7 side, unless the implication is is that they're on</p> <p>8 the same side, okay -- what does it say there? It</p> <p>9 says Barbounis was present and witnesses this -- this</p> <p>10 thing, and this is -- this is where the problem</p> <p>11 exists with the multiple representations. When she's</p> <p>12 talking to Ziv, okay, she says that there is one</p> <p>13 person on the couch on one side and there is another</p> <p>14 person on the couch on the other side.</p> <p>15 Q. Isn't that what it says here?</p> <p>16 A. This -- this implies, if we can go up</p> <p>17 to 20 --</p> <p>18 Q. Doesn't --</p> <p>19 A. -- was sitting on the couch --</p> <p>20 Q. -- Number 20 say that --</p> <p>21 A. -- between -- listen. Hold on a</p> <p>22 second.</p> <p>23 Q. Mr. Roman --</p> <p>24 A. -- between Barbounis and McNulty.</p> <p>25 Q. Right.</p>	<p>1 and even if there was contact on someone else, the</p> <p>2 ability to have two hands cross sitting on a couch I</p> <p>3 don't see how it works. I'm not someone who deals</p> <p>4 with anatomy, but to me that doesn't seem like it's</p> <p>5 possible.</p> <p>6 Q. Okay.</p> <p>7 A. The third reason that I don't think</p> <p>8 that this is possible is because of -- if we go to --</p> <p>9 where is the upstairs part. Here, the second</p> <p>10 sentence after the kitchen. Thereafter, charging --</p> <p>11 hold on. Up. Go up. Thereafter charging party</p> <p>12 witnesses respondent Roman leave the room and go</p> <p>13 upstairs. Mr. Carson, there was no upstairs. It was</p> <p>14 a one level --</p> <p>15 Q. So because of that it didn't happen.</p> <p>16 A. No, I'm giving you my analysis of</p> <p>17 multiple reasons why I think beyond my own personal</p> <p>18 denial that anything happened --</p> <p>19 Q. Do you have another reason?</p> <p>20 A. -- that this would be -- I do. I'm</p> <p>21 just saying --</p> <p>22 Q. Go ahead. We got this one.</p> <p>23 A. -- there was no -- there was no</p> <p>24 upstairs, so now we have three reasons why what she</p> <p>25 writes here is completely unplausible in my opinion.</p>

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<p>1 Q. Can you -- can we --</p> <p>2 A. Beyond my own personal denial. The</p> <p>3 fourth reason --</p> <p>4 Q. Mr. Roman --</p> <p>5 A. Yes.</p> <p>6 Q. -- just slow down for a second. Okay?</p> <p>7 A. Sure.</p> <p>8 Q. You've listed three reasons so far.</p> <p>9 A. Three reasons. I have two more to go.</p> <p>10 Q. Tell us number four and just please be</p> <p>11 brief and so we can get through this.</p> <p>12 A. Mr. Carson, I'm trying to give you the</p> <p>13 most accurate representation of what I remember from</p> <p>14 that evening as it relates to everything else.</p> <p>15 Q. Just give us number four. Let's go.</p> <p>16 A. The fourth reason is because in terms</p> <p>17 of my own placement of where I was that evening --</p> <p>18 Q. Right.</p> <p>19 A. -- was sitting at the center of the</p> <p>20 table surrounded by all members of the Pinsky Centre</p> <p>21 for the entirety of the evening, there was never a</p> <p>22 time that I would have sat on a couch, and, if there</p> <p>23 was, it wouldn't be sitting next to Barbounis or</p> <p>24 McNulty. Could I have maybe been sitting next to</p> <p>25 them? Maybe. It was a long -- it was two and a half</p>	<p>1 being specific enough before --</p> <p>2 Q. Mr. Roman, let's go. What's number</p> <p>3 five?</p> <p>4 A. -- and now I'm trying to be more</p> <p>5 specific.</p> <p>6 Q. Okay. What's number five?</p> <p>7 A. The fifth reason is because Ms.</p> <p>8 McNulty, at least from what I remember Ms. McNulty</p> <p>9 being, had been engaging in intimate and I would say</p> <p>10 deep conversations of -- she was pretty inebriated</p> <p>11 that evening, with Raheem Kassam and Lisa Barbounis.</p> <p>12 She had spent the evening trying to be with</p> <p>13 Mr. Kassam and even elected to stay at that apartment</p> <p>14 and slept there after you're alleging -- or she's</p> <p>15 alleging that she was sexually assaulted. So this is</p> <p>16 what I don't understand. She mischaracterizes --</p> <p>17 Q. We got it. She was talking to -- she</p> <p>18 was talking to Kassam, so it couldn't have happened.</p> <p>19 A. It's not just that she's talking to</p> <p>20 Kassam. This is my final analysis. She doesn't</p> <p>21 remember what the place looks like. She</p> <p>22 mischaracterizes the room. She doesn't remember how</p> <p>23 many people were there. And there is no other</p> <p>24 witnesses to what happened beyond Ms. Barbounis who</p> <p>25 has her own reasons and motivation to say something</p>
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<p>1 years ago. But I specifically remember engaging in a</p> <p>2 game of Battleship against Elliot Miller, the game</p> <p>3 which we had taken from the previous bar that we had</p> <p>4 been from --</p> <p>5 Q. What's number five?</p> <p>6 A. That's four.</p> <p>7 Q. Right.</p> <p>8 A. Not five.</p> <p>9 Q. What's number five?</p> <p>10 A. That's four.</p> <p>11 Q. I asked you what is number five.</p> <p>12 A. Well, I'm saying that that's the other</p> <p>13 reason, and also --</p> <p>14 Q. We got that one. Go ahead.</p> <p>15 A. Mr. Carson, I'm trying to give you a</p> <p>16 complete answer.</p> <p>17 Q. I know but we're just -- we got more to</p> <p>18 go through, so, like, give us the fifth one so we can</p> <p>19 get -- I'm trying to give you an opportunity to give</p> <p>20 us the reasons.</p> <p>21 A. I'm giving you the reasons and I'm</p> <p>22 trying to take my opportunity to tell you what the</p> <p>23 reasons are.</p> <p>24 Q. Go ahead.</p> <p>25 A. Okay? You had complained that I wasn't</p>	<p>1 negative about me. She doesn't even remember what</p> <p>2 the layout of the actual people and who was there,</p> <p>3 what was there, what was talked about. And, lastly,</p> <p>4 her condition itself is misrepresented 12 separate</p> <p>5 times in 12 different stories.</p> <p>6 Q. What condition is that?</p> <p>7 A. The condition that she alleges she was</p> <p>8 in saying that she was assaulted, and that never</p> <p>9 happened, Mr. Carson.</p> <p>10 Q. Okay.</p> <p>11 A. That's why she's telling a lie, or</p> <p>12 maybe she's just become so engrossed in this over the</p> <p>13 past year and a half, two years, three years,</p> <p>14 whenever she concocted this, that she's eventually</p> <p>15 become part of the tissue of lies that Ms. Barbounis</p> <p>16 has spread to so many different people and has caused</p> <p>17 so much damage to so many people through her own</p> <p>18 self-proclivities and malingered behavior.</p> <p>19 Q. Or maybe you just sexually assaulted</p> <p>20 her at a party and screwed up because you were</p> <p>21 drinking and smoking weed, right?</p> <p>22 A. No, Mr. Carson, that never happened,</p> <p>23 and I do not appreciate the opportunity you've tried</p> <p>24 to take to either oppress, harass, or annoy me as a</p> <p>25 deponent in today's deposition.</p>

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<p>1 Q. Mr. Roman, what are you, just like the</p> <p>2 unluckiest person on the planet?</p> <p>3 A. Well, Mr. Carson, I would characterize</p> <p>4 you as the unluckiest person on the planet because</p> <p>5 these are your clients, but I didn't choose that; you</p> <p>6 did.</p> <p>7 Q. Well, why -- so how many women have</p> <p>8 accused you of sexual harassment in the last, say,</p> <p>9 ten years?</p> <p>10 A. Well, if we take your clients --</p> <p>11 Q. Yeah, let's --</p> <p>12 A. -- and if we take --</p> <p>13 Q. -- let's start with them.</p> <p>14 A. -- and if we take -- well, I think the</p> <p>15 answer is is anyone who has been represented by the</p> <p>16 Derek Smith Law Group in an attempt to get over \$30</p> <p>17 million from the Middle East Forum, that's how many</p> <p>18 people have represented --</p> <p>19 Q. Leah -- Alana Goodman?</p> <p>20 A. I'm giving an answer.</p> <p>21 THE COURT REPORTER: I can't hear</p> <p>22 you.</p> <p>23 BY MR. CARSON:</p> <p>24 Q. Well, the answer is a number, right?</p> <p>25 So give me the number of people.</p>	<p>1 about what Alana Goodman allegedly said --</p> <p>2 Q. My question, Mr. Roman, was, is that</p> <p>3 sexual harassment, that behavior?</p> <p>4 A. No, Mr. Carson, because it didn't</p> <p>5 happen. You have to be able to take into account the</p> <p>6 entirety of the story and the explanation I have to</p> <p>7 give if you want to know what I think about it.</p> <p>8 Q. Well, Alana Goodman described in detail</p> <p>9 it happening, so was she lying?</p> <p>10 A. What -- my interpretation of what Alana</p> <p>11 Goodman said is is that I found out that a friend of</p> <p>12 mine -- and you've never asked me what's the story</p> <p>13 that Alana Goodman was talking about and did Alana</p> <p>14 Goodman ever get the story, did she ever continue</p> <p>15 communications with me afterwards, was there any</p> <p>16 conversations that I've had with her after your</p> <p>17 client recorded her without her knowledge of her</p> <p>18 being recorded. Was --</p> <p>19 Q. Does that matter?</p> <p>20 A. It all matters because maybe the tape</p> <p>21 that you played for Daniel Pipes on Wednesday, or on</p> <p>22 Tuesday, was not the full recording of the</p> <p>23 conversation between Ms. Goodman and Ms. Barbounis at</p> <p>24 the Schuyler Arms Tavern [ph] on June 26th, 2019.</p> <p>25 Maybe you should have done a little bit more</p>
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<p>1 A. There is no number. The number is</p> <p>2 however many clients you have. From what I</p> <p>3 understand --</p> <p>4 Q. Let's count --</p> <p>5 A. -- Alana Goodman -- Alana Goodman --</p> <p>6 Q. Alana Goodman.</p> <p>7 A. -- has never accused me of sexual</p> <p>8 harassment.</p> <p>9 Q. You don't call it an accusation of</p> <p>10 sexual harassment when she says that you whipped your</p> <p>11 penis out in front of her at a bar and told her --</p> <p>12 A. No --</p> <p>13 Q. -- that --</p> <p>14 A. -- what she said is --</p> <p>15 Q. Let me finish my question, Mr. Roman.</p> <p>16 A. I'm listening.</p> <p>17 Q. -- and you told her that she needed to</p> <p>18 come -- that you needed to come to her hotel room in</p> <p>19 order to get a story and that you wanted to trade sex</p> <p>20 for stories?</p> <p>21 A. No --</p> <p>22 Q. That's not sexual harassment?</p> <p>23 A. -- Mr. Carson, if you had done your</p> <p>24 investigation and you had looked into the background</p> <p>25 of that, you would realize that there is four things</p>	<p>1 investigation into what actually happened there,</p> <p>2 Mr. Carson.</p> <p>3 Q. Well, what do you think happened there?</p> <p>4 A. This is what I think happened. I think</p> <p>5 Ms. Barbounis was right on the precipice of filing</p> <p>6 her EEOC complaint against me and my organization in</p> <p>7 Philadelphia with you as her attorney. She started</p> <p>8 going out trying to misrepresent everything that ever</p> <p>9 happened when she was an employee of the Middle East</p> <p>10 Forum up until that time and she told a story of lies</p> <p>11 to Ms. Alana Goodman and Goodman herself said, you</p> <p>12 know what, maybe there is something that I'm going to</p> <p>13 say happened when Roman wasn't even an employee of</p> <p>14 the Middle East Forum and had found out that the</p> <p>15 White House advisor for counterterrorism had told him</p> <p>16 that the man responsible for murdering his friend,</p> <p>17 beheading his friend, the day that his son was born</p> <p>18 -- maybe you didn't hear about this, Mr. Carson --</p> <p>19 Q. I'm waiting for a link.</p> <p>20 A. -- was not going to be assassinated --</p> <p>21 was not going to be assassinated by President Obama.</p> <p>22 Okay?</p> <p>23 Q. Mr. Roman --</p> <p>24 A. On --</p> <p>25 Q. -- I'm waiting for you to link this to</p>

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<p>1 what she --</p> <p>2 A. I'm linking it to you, Mr. Carson,</p> <p>3 because the conversations that I had with Ms. Goodman</p> <p>4 after this tape allegedly took place would show you</p> <p>5 that I, first of all, don't even remember any of this</p> <p>6 happening, but even to the extent that someone may</p> <p>7 have, I don't know, you know, urinated on the side of</p> <p>8 a building, the way it was characterized, it was a</p> <p>9 complete mischaracterization of everything. I cannot</p> <p>10 wait until you bring Ms. Goodman forward as a witness</p> <p>11 in this case --</p> <p>12 Q. Me neither.</p> <p>13 A. -- so she can tell what happens.</p> <p>14 Q. Okay.</p> <p>15 A. That's what I'm waiting for,</p> <p>16 Mr. Carson. Maybe you would like to depose her, too.</p> <p>17 Q. I would suggest to you that you'll have</p> <p>18 that opportunity. So --</p> <p>19 A. Beyond anything else, I would have to</p> <p>20 see why she's even relevant to this case due to the</p> <p>21 fact that any interactions that took place between me</p> <p>22 and her from August of 2015 until today have been one</p> <p>23 of a professional nature --</p> <p>24 Q. When is the last --</p> <p>25 A. -- and not what Ms. Barbounis has on a</p>	<p>1 didn't get into my professional history, but I'm also</p> <p>2 an investigative journalist --</p> <p>3 Q. Mr. Roman --</p> <p>4 A. -- if you want to see my work --</p> <p>5 Q. -- I'm not asking questions about that</p> <p>6 right now.</p> <p>7 A. You're asking me -- you're asking me</p> <p>8 how I may know that Alana Goodman represented --</p> <p>9 Q. No --</p> <p>10 A. -- that what she said on tape wasn't</p> <p>11 the whole story --</p> <p>12 Q. Right. Who told you that?</p> <p>13 A. -- or wasn't accurate story.</p> <p>14 THE COURT REPORTER: One at a</p> <p>15 time.</p> <p>16 BY MR. CARSON:</p> <p>17 Q. Who told you that the recording was</p> <p>18 made without her knowledge?</p> <p>19 A. Mr. Carson, I'm going to invoke</p> <p>20 Pennsylvania Shield Law and the journalist's</p> <p>21 privilege in terms of giving you that answer.</p> <p>22 Q. You can't.</p> <p>23 A. I just did.</p> <p>24 Q. You can't -- I mean, you're giving me a</p> <p>25 lot of good reasons to make -- to make it so we're</p>
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<p>1 tape that she surreptitiously made as she's done to</p> <p>2 so many other people.</p> <p>3 Q. When is the last time you spoke to</p> <p>4 Ms. Goodman?</p> <p>5 A. I actually printed out -- and I can</p> <p>6 volunteer to give this to you --</p> <p>7 Q. I just want a date.</p> <p>8 A. Probably at the end of 2019.</p> <p>9 Q. Did you ask her about the recording?</p> <p>10 A. I didn't know about the recording at</p> <p>11 the time --</p> <p>12 Q. Have you ever spoken to her about the</p> <p>13 recording?</p> <p>14 A. No, I have not.</p> <p>15 Q. How do you know that it was made</p> <p>16 without her knowledge?</p> <p>17 A. I can't comment on privileged matters,</p> <p>18 Mr. Carson.</p> <p>19 Q. That's not privileged.</p> <p>20 A. No, I'm saying that there may or may</p> <p>21 not have been a conversation between counsel, but I'm</p> <p>22 not a hundred percent sure. I do know, though, that</p> <p>23 a story that I've been investigating writing as it</p> <p>24 relates to Lisa Barbounis for the better part of the</p> <p>25 last year and a half -- one of the other jobs -- we</p>	<p>1 going to have to come back and do this all over</p> <p>2 again.</p> <p>3 A. Mr. Carson, I'm willing to talk to you</p> <p>4 all night.</p> <p>5 MR. CAVALIER: We can make it very</p> <p>6 simple. Lisa admitted during her</p> <p>7 deposition that she didn't (indiscernible.)</p> <p>8 MR. CARSON: Jon, you're not</p> <p>9 testifying here today.</p> <p>10 THE COURT REPORTER: Sorry. Mr.</p> <p>11 Cavalier, I didn't hear what you said.</p> <p>12 MR. CARSON: He didn't say</p> <p>13 anything.</p> <p>14 BY MR. CARSON:</p> <p>15 Q. Mr. Roman --</p> <p>16 A. Sure.</p> <p>17 Q. -- did you ever tell Ms. Goodman that</p> <p>18 you wanted to go -- form a relationship with her</p> <p>19 where you would give her stories in exchange for sex?</p> <p>20 A. No, never.</p> <p>21 Q. Did you ever pull your penis out in</p> <p>22 front of her?</p> <p>23 A. No, never.</p> <p>24 Q. So she's lying then, right?</p> <p>25 A. No, she's not lying. She's</p>



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<p>1 mischaracterizing what she saw.</p> <p>2 Q. Okay. So --</p> <p>3 A. Everything in your world is binary,</p> <p>4 lie, not lie. No. I just told you what I think</p> <p>5 happened.</p> <p>6 Q. Has Daniel Pipes ever spoken to you</p> <p>7 about Ms. Goodman?</p> <p>8 A. No, he hasn't. Actually, no, that's</p> <p>9 not true. He has spoken to me about Ms. Goodman.</p> <p>10 Q. In connection with her claims that you</p> <p>11 were trying to trade sex for stories?</p> <p>12 A. No, he never spoke to me about that.</p> <p>13 MR. CAVALIER: I'm going to object</p> <p>14 to the form on the use of the word</p> <p>15 claims.</p> <p>16 THE WITNESS: Okay, that's fair.</p> <p>17 BY MR. CARSON:</p> <p>18 Q. All right. Let's continue. So --</p> <p>19 A. Mr. Carson, if you'll just give me one</p> <p>20 second, I'm going to put the light on here so it gets</p> <p>21 better. Okay? Is that fair?</p> <p>22 Q. Yeah, go ahead.</p> <p>23 THE VIDEO SPECIALIST: We're off</p> <p>24 the record. It's 5:18 p.m.</p> <p>25 MR. CARSON: We don't have to go</p>	<p>1 A. That's subject to trade secrets. I'm</p> <p>2 open to discussing it under seal, if you're okay with</p> <p>3 that, Mr. Carson.</p> <p>4 Q. Yeah, I mean you can mark any documents</p> <p>5 confidential if you --</p> <p>6 A. As Ms. -- can we mark this part as</p> <p>7 sealed here or at least the subject of the</p> <p>8 conversation being sealed?</p> <p>9 Q. I will -- I promise you I will not file</p> <p>10 anything that you're about to say on the docket. If</p> <p>11 I file it, I'll file it under seal.</p> <p>12 A. Okay.</p> <p>13 Q. Please let me know --</p> <p>14 MR. CAVALIER: We'll take that</p> <p>15 representation.</p> <p>16 MR. CARSON: Jon, okay?</p> <p>17 MR. CAVALIER: Yeah, we'll accept</p> <p>18 that, Seth. Thank you.</p> <p>19 THE WITNESS: Am I -- Jon, can I</p> <p>20 talk about this?</p> <p>21 MR. CAVALIER: Yes. So long as</p> <p>22 Mr. Gold is okay with it.</p> <p>23 THE WITNESS: Mr. Gold?</p> <p>24 MR. GOLD: I'm fine.</p> <p>25 THE WITNESS: Okay.</p>
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<p>1 off the record.</p> <p>2 THE WITNESS: Sorry about that.</p> <p>3 Is that better?</p> <p>4 MR. CARSON: Back on the record.</p> <p>5 THE VIDEO SPECIALIST: We're back</p> <p>6 on the record. It's 5:18 p.m.</p> <p>7 BY MR. CARSON:</p> <p>8 Q. Mr. Roman, did you take Lisa Barbounis</p> <p>9 to Israel?</p> <p>10 A. Yes.</p> <p>11 Q. Did you tell Daniel Pipes that you were</p> <p>12 going to take her to Israel?</p> <p>13 A. When?</p> <p>14 Q. When you took her to Israel.</p> <p>15 A. I told Matt Bennett, I told Marnie</p> <p>16 Meyer, I told Tricia McNulty, I told EJ Kimball, I</p> <p>17 told --</p> <p>18 Q. My question was --</p> <p>19 A. -- most of the MEF staff, and I said to</p> <p>20 Mr. Pipes that there was a staff trip to Israel, but</p> <p>21 I never told him which staff went. So in terms of</p> <p>22 the general answer, yes, I said that she was going to</p> <p>23 Israel, but I never used her specific name.</p> <p>24 Q. Why didn't you want Daniel Pipes to</p> <p>25 know that you were taking her?</p>	<p>1 BY MR. CARSON:</p> <p>2 Q. Please let me know when you're -- when</p> <p>3 we're done because -- you know what I mean --</p> <p>4 A. This part, Mr. Carson, covers the</p> <p>5 activities of MEF from the end of December 2017 until</p> <p>6 I would say like April 25th, 2018, not as it relates</p> <p>7 --</p> <p>8 Q. But listen to my question. My question</p> <p>9 is why didn't you want Mr. Pipes to know -- Dr. Pipes</p> <p>10 to know --</p> <p>11 A. Well, I'm sharing that with you.</p> <p>12 Q. Okay. That you're -- so, for the</p> <p>13 record, the question is why didn't you want Dr. Pipes</p> <p>14 to know that you were going to bring Lisa to Israel.</p> <p>15 A. Well, I never said that I didn't want</p> <p>16 him to know that I was bringing someone to Israel.</p> <p>17 That's a mischaracterization of what I'm about to</p> <p>18 say. You're asking me why there was a general</p> <p>19 nonannouncement of which staff were going to Israel.</p> <p>20 Is that fair characterization of my -- what my answer</p> <p>21 will be?</p> <p>22 Q. No, Lisa Barbounis alleged that she was</p> <p>23 told that -- not to say anything, that you instructed</p> <p>24 her not to tell anyone that you were going to take</p> <p>25 her.</p>

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<p>1 A. That's correct.</p> <p>2 Q. So why did you give her that</p> <p>3 instruction?</p> <p>4 A. So in December of 2017 -- this part's</p> <p>5 the part under seal. Okay? In December of 2017 I</p> <p>6 was approached by an individual who works for a</p> <p>7 middle eastern government that the United States is</p> <p>8 allied with asking us to put together a plan that</p> <p>9 would take on Iran, the Islamic Republic of Iran, and</p> <p>10 this involved seven different trips that took place</p> <p>11 over five months starting with a trip to Italy and</p> <p>12 then a trip to Israel, which is right around when the</p> <p>13 Patriots were playing the Eagles in the Superbowl,</p> <p>14 and -- by the way, at each of these trips that took</p> <p>15 place we stayed at Airbnbs. We did not stay at</p> <p>16 hotels. Okay?</p> <p>17 Q. Who is we?</p> <p>18 A. The people who went on these different</p> <p>19 trips. Multiple staff members and multiple MEF</p> <p>20 contractors went on multiple trips regarding what we</p> <p>21 call in the organization The Little Project. Okay?</p> <p>22 Q. I just want to relegate our</p> <p>23 conversation to the one that --</p> <p>24 A. Well, I'm giving you the reason --</p> <p>25 Q. -- one that --</p>	<p>1 staff, by the way, the story, too, about why we were</p> <p>2 taking these precautions. I was almost put into an</p> <p>3 Egyptian jail. If you're familiar with Cairo's</p> <p>4 Scorpion prison, Mr. Carson, it's where ISIS, Al</p> <p>5 Qaeda, Hezbollah, Muslim Brotherhood, all the bad</p> <p>6 guys are in. I was in a car about to be taken to the</p> <p>7 prison until an embassy official from this country we</p> <p>8 were dealing with said it's okay, he's fine, and then</p> <p>9 I went on my way to stay at the Four Seasons in Cairo</p> <p>10 next to the Giza Zoo, G-i-z-a Zoo. There's a few</p> <p>11 Four Seasons there. Across from the Nile River. The</p> <p>12 next day I got into a car with Mr. Dashti and we</p> <p>13 drove about two and a half hours out to a military</p> <p>14 base, an Egyptian military base, between Alexandria</p> <p>15 and Cairo --</p> <p>16 Q. When is this?</p> <p>17 A. -- where -- this is in January of 2018.</p> <p>18 Q. Right. So we're about four months away</p> <p>19 from where we're talking about.</p> <p>20 A. You're six weeks away from what we're</p> <p>21 talking about.</p> <p>22 So we went there and -- like I said, it</p> <p>23 was around the time of the Superbowl, the Patriots</p> <p>24 were playing the Eagles. We watched that game in</p> <p>25 Israel, went to Italy, went to Egypt, and we came</p>
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<p>1 A. -- why. So there was -- I'm sorry, the</p> <p>2 stenographer is shaking her -- did I not say</p> <p>3 something?</p> <p>4 THE COURT REPORTER: No, you guys</p> <p>5 are just talking all over each other. I</p> <p>6 know I keep saying it, but you guys keep</p> <p>7 doing it, so please try to talk one at a</p> <p>8 time, I would appreciate it.</p> <p>9 THE WITNESS: Okay. My apologies.</p> <p>10 Mr. Carson, can I continue?</p> <p>11 BY MR. CARSON:</p> <p>12 Q. Yeah, so -- but just -- just listen to</p> <p>13 the question. So --</p> <p>14 A. Sure.</p> <p>15 Q. -- why was it that you told Lisa not to</p> <p>16 tell anyone that you were taking her to Israel, just</p> <p>17 quick, quick answer. I don't need a whole backstory.</p> <p>18 A. Well, the whole backstory is the reason</p> <p>19 for the answer, Mr. Carson. So -- it is. So I</p> <p>20 started off in Italy, then went to Israel, then with</p> <p>21 a man named Nir Dashti, N-i-r, space, D-a-s-h-t-i,</p> <p>22 Nir Dashti, I traveled back from Israel to Italy and</p> <p>23 then from Italy I went to Cairo. I was held up at</p> <p>24 the airport in Cairo from about 2 in the morning</p> <p>25 until about 5 in the morning, and I -- I told the</p>	<p>1 back. There I have never been more afraid for my</p> <p>2 life besides the time that I was in the army because</p> <p>3 of the work that MEF was doing. I recorded a video</p> <p>4 with Matt Bennett which would be released in the</p> <p>5 event of my demise. And the reason I say all of this</p> <p>6 is because a man named Michael Levin who I was</p> <p>7 friends with died after being murdered by Hezbollah.</p> <p>8 A man named Steven Sotloff who was the second hostage</p> <p>9 killed by ISIS in September 2nd -- there is -- yeah,</p> <p>10 September 2nd, 2014 -- I saw him beheaded,</p> <p>11 Mr. Carson. I went into a downward spiral for the</p> <p>12 better part of a year between 2014 and 2015 because</p> <p>13 this is the subject of the kind of work that we do.</p> <p>14 If we don't take security precautions like the ones</p> <p>15 I'm laying out to you right now, people can die. I</p> <p>16 am not exaggerating this. If you would like to speak</p> <p>17 with anyone who is on our board or if you would like</p> <p>18 to speak with other staff who are involved in this --</p> <p>19 I've got a guy right now who has been rotting in a</p> <p>20 Turkish prison for the past three years because he</p> <p>21 didn't take proper security measures. So if you're</p> <p>22 asking me -- if you're asking me why there was an</p> <p>23 instruction to compartmentalize information from a</p> <p>24 relatively new employee who only been working with us</p> <p>25 for five to six months -- by the way, that employee</p>

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<p>1 was the third person who was asked to go on this</p> <p>2 trip. First it was Bennett, a man who speaks Hebrew,</p> <p>3 then it was Meyer, someone who is 20 years my senior</p> <p>4 and has extensive experience who wanted to violate</p> <p>5 the security protocols that we had put in place so no</p> <p>6 one would be hurt, and lastly --</p> <p>7 Q. How did she want --</p> <p>8 A. Excuse me?</p> <p>9 Q. How did she want to violate the</p> <p>10 security protocols?</p> <p>11 A. If you stay in a hotel, when you are</p> <p>12 doing the kind of work that we were doing -- think</p> <p>13 about it for a second. You have staff that are</p> <p>14 there. You have someone cleaning your room. You</p> <p>15 have two people who are different. You have</p> <p>16 individuals that come and go. You have no ability to</p> <p>17 have physical security over your own space. Now, if</p> <p>18 you want to speak about the exact place where we</p> <p>19 were, I actually got pictures of that apartment that</p> <p>20 I would be very happy to make available to you.</p> <p>21 Again, the architecture, the design, whatever else.</p> <p>22 And also there is a list of 15 people that we met</p> <p>23 with between March -- I'll give you the exact date,</p> <p>24 March 11th and March 15th, March 11th and March 16th,</p> <p>25 including representatives of Israel's intelligence</p>	<p>1 Q. Okay. Is this the -- is this -- can</p> <p>2 you see that? Hold on.</p> <p>3 A. I can't see anything.</p> <p>4 Q. I don't know why my screen share isn't</p> <p>5 working. Start screen share. So -- here. Is that</p> <p>6 where you stayed?</p> <p>7 A. Yes.</p> <p>8 Q. And how many bathrooms did it have?</p> <p>9 A. We found out there was one but we</p> <p>10 thought that there was two.</p> <p>11 Q. Did you -- why did you think there was</p> <p>12 two?</p> <p>13 A. Ms. Barbounis booked the Airbnb.</p> <p>14 Q. You didn't promise her that there would</p> <p>15 be two bathrooms?</p> <p>16 A. No, what I said was --</p> <p>17 Q. That each of you would have your own</p> <p>18 living space?</p> <p>19 A. No, what I -- there was a living space.</p> <p>20 If you look at the curtain there behind the section,</p> <p>21 so if we look at this for a second -- can you zoom in</p> <p>22 on that? Go to the right. So this is the common</p> <p>23 area where meetings were held. Okay? And if you go</p> <p>24 there, back there, in that room with the shades or</p> <p>25 whatever you want to call it, that's where they were,</p>
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<p>1 agencies, one of the commanders from Israel's police</p> <p>2 department, members of parliament, individuals who</p> <p>3 disagree with MEF, and we actually have affidavits</p> <p>4 that I know you asked about in Mr. Pipes' deposition,</p> <p>5 but also that -- can I talk to counsel for a second</p> <p>6 just to direct them to do something?</p> <p>7 Mr. Cavalier, Mr. Gold, if you have</p> <p>8 those affidavits, please give them to Mr. Carson so</p> <p>9 he has more context for this.</p> <p>10 They will attest to not just the manner</p> <p>11 of why we had to keep this secret, but they will also</p> <p>12 attest to the veracity of what I'm telling you right</p> <p>13 now in terms of the subject of this. In fact, it was</p> <p>14 Lisa Barbounis who worked on the presentation that</p> <p>15 eventually was given to a senior minister in the</p> <p>16 government of who I'm talking to, and that senior</p> <p>17 minister accepted the work that we were doing. So</p> <p>18 any mischaracterization of why information security</p> <p>19 protocols and compartmentalizing personnel --</p> <p>20 personnel and personal security at that time never</p> <p>21 told you the whole story, and if they did you would</p> <p>22 know all this of what I'm saying to you right now.</p> <p>23 Q. So you did tell Marnie Meyer then that</p> <p>24 she couldn't go if she wanted to get her hotel room.</p> <p>25 A. Hundred percent.</p>	<p>1 and if you go to the right, there is a kitchen --</p> <p>2 again, it's like this combined kitchen/living room</p> <p>3 area like we were talking about beforehand. There</p> <p>4 was a bomb shelter, a restroom, and another bedroom.</p> <p>5 So on the complete opposite ends of where people</p> <p>6 were.</p> <p>7 Q. Is this a bedroom right here?</p> <p>8 A. Yeah, back there, that's where she</p> <p>9 chose to stay.</p> <p>10 Q. When you say she chose to stay there,</p> <p>11 how many rooms were in -- how many bedrooms were</p> <p>12 there?</p> <p>13 A. Three.</p> <p>14 Q. And was there -- where was the other</p> <p>15 two bedrooms?</p> <p>16 A. So if you click there --</p> <p>17 Q. Oh, you know why? It's a screen shot.</p> <p>18 That's why I can't -- it's not the website.</p> <p>19 A. Actually, if you zoom in on those</p> <p>20 screen shots --</p> <p>21 Q. They're going to be --</p> <p>22 A. That's -- you can't really see --</p> <p>23 Q. But, Mr. Roman, was it one of these two</p> <p>24 couches that you were on when she alleges that you</p> <p>25 put your foot up her butt?</p>

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<p>1 A. Mr. Carson, that never happened, so I 2 can't answer a question that's based on a factual 3 predicate that never happened.</p> <p>4 Q. Well, did the two of you sit on one of 5 those two couches one night?</p> <p>6 A. Could you be more specific?</p> <p>7 Q. Yeah, did you come home drunk after 8 going out and come back and start talking about 9 inappropriate sexual things in front of Ms. 10 Barbounis?</p> <p>11 A. No, Mr. Carson, that never happened.</p> <p>12 Q. You didn't try to have sex with Leah 13 Merville while you were there?</p> <p>14 A. No, Mr. Carson, and just in terms of 15 general questions of a nature which may regard any 16 intimacy or alleged intimacy, I'm going to invoke my 17 privacy privilege under Israel's basic law for human 18 dignity and liberty as amended in 1989.</p> <p>19 Q. That's not a privilege you can invoke 20 in this case.</p> <p>21 A. Actually it is and I'm going to invoke 22 that since the -- well, actually, if counsel has an 23 answer to further give reason for that?</p> <p>24 Q. I mean, look, you can do whatever you 25 want, we'll just make a record of it and then we'll</p>	<p>1 Q. Mr. Roman, are you attempting to invoke 2 a protection under Israeli law right now?</p> <p>3 A. I am.</p> <p>4 Q. Okay. All right. So my client alleges 5 that you came back to the room and began to describe 6 in detail different sexual encounters with different 7 women. Did that happen?</p> <p>8 A. No.</p> <p>9 Q. My client alleges that you asked her 10 for a blowjob when you got back to the room. Did 11 that happen?</p> <p>12 A. No, Mr. Carson, I find this offensive.</p> <p>13 Q. It's important to -- for you to put 14 your position on the record because these are 15 certainly issues of material fact that are in 16 dispute. So it's important that you dispute them. I 17 think your counsel would probably agree with that.</p> <p>18 My client alleges that during this trip 19 you asked her to engage in different sexual acts with 20 her, primarily -- maybe even exclusively, oral sex. 21 Did that ever happen?</p> <p>22 A. No.</p> <p>23 Q. And after this trip my client alleges 24 that you started treating her differently because she 25 said no. Do you agree with that?</p>
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<p>1 deal with it --</p> <p>2 A. Sure.</p> <p>3 Q. So Ms. Barbounis alleges that you sat 4 down on the couch next to her and put your foot under 5 her butt and put it up there and then said now that 6 my foot is up your butt or in your butt or next to 7 your butt then I guess we can take our relationship 8 to the next level or something of that nature. Did 9 that happen?</p> <p>10 A. No.</p> <p>11 Q. Did you -- did you describe having 12 sexual intercourse with Leah Merville to my client?</p> <p>13 A. No.</p> <p>14 Q. Did you say to my client how nice her 15 body was when you were having sex with her?</p> <p>16 A. No.</p> <p>17 Q. Did you try to have sex with anyone 18 else while you were in Israel besides Leah Merville?</p> <p>19 A. Mr. Carson, again, that question is 20 based on a factual predicate of an event that never 21 happened, and, beyond that, I am not going to answer 22 any questions that you ask that are related to a 23 privacy privilege that I have as an Israeli citizen 24 under Israel's basic law of human dignity and privacy 25 1989.</p>	<p>1 A. No, I disagree, and there would be two 2 specific instances that I can account that would 3 prove that disagreement. The first would be an 4 employee review that all new Middle East Forum 5 employees receive between six to seven months into 6 their tenure that Ms. Barbounis had in May of 2018. 7 She had a full review, and that review included the 8 opportunity to give feedback on me to Mr. Pipes 9 directly, which she did. And I'm sure if you don't 10 have a copy of that review, you should get one. And 11 the second instance is my intention to promote Lisa 12 Barbounis up until the time when she told gross lies 13 about me on October 31st, 2018, in a note to 14 Mr. Pipes. So there is really this dissonance 15 between what happened according to the textual record 16 and the lies she's been telling since October of 17 2018, and it goes all the way throughout today, to 18 this very point.</p> <p>19 Q. Why would she lie?</p> <p>20 A. Ms. Barbounis as from at least what I 21 understand, according to a -- whatchamacallit, a 22 supplemental report that was filed with Barbara Ziv 23 is I think the best record of why Ms. Barbounis would 24 not just lie but would wrap herself in a shroud of 25 dishonesty which has been going with her ever since</p>



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<p>1 she was accused of having sexual relations with</p> <p>2 Congressman Ryan Costello prior to working at the</p> <p>3 Middle East Forum. So this is something that</p> <p>4 backdates before she even started for MEF.</p> <p>5 Q. Your testimony is that she lied because</p> <p>6 she had sex with somebody else? I don't</p> <p>7 understand --</p> <p>8 A. No, that's not what I said. I said her</p> <p>9 shroud of lies predates her time of working with the</p> <p>10 Middle East Forum. To ask me what I think Lisa</p> <p>11 Barbounis thinks is to ask me what, I don't know,</p> <p>12 Vladimir Putin thinks. I'm not in the man's head but</p> <p>13 I see his destruction. The same thing with Lisa, I'm</p> <p>14 not in her head, but wow have I seen how much she has</p> <p>15 ruined people's lives not just by -- hold on. Not</p> <p>16 just by what I have seen happen to me personally</p> <p>17 because of the wealth of dishonesty that is in her</p> <p>18 reserves of just self-destructive behavior but also</p> <p>19 from what I've seen from other people. For instance,</p> <p>20 she ruined the lives of Danny Tommo and Jazmin</p> <p>21 Bishop, two people -- I would categorize them as</p> <p>22 whistleblowers that came to the Middle East Forum,</p> <p>23 and then she employed a web of criminals -- she</p> <p>24 employed a web of criminals in the United Kingdom to</p> <p>25 try to, A, tamper with their testimony; B, try to</p>	<p>1 A. Not Jazmin Bishop. The full name is</p> <p>2 Kalina Jazmin Bishop. Those are the first two.</p> <p>3 There is about ten people that I can think of of</p> <p>4 where Ms. Barbounis has been like a hurricane</p> <p>5 destroying entire villages. You know, she literally</p> <p>6 lives in a Potemkin village.</p> <p>7 Q. All right. So let's just -- let's just</p> <p>8 do the list. All right? So I just want to hear the</p> <p>9 names of the people whose lives she ruined. Okay?</p> <p>10 A. Sure.</p> <p>11 Q. And then I'll ask you about them, so</p> <p>12 you don't have to go into why --</p> <p>13 A. Sure. So I prepared this for you if</p> <p>14 you just want me to give this to you after we're done</p> <p>15 this right now.</p> <p>16 Q. That's fine, but just Danny Thomas,</p> <p>17 Kalina Jazmin Bishop. Who else?</p> <p>18 A. Caitriona Brady.</p> <p>19 Q. She ruined Caitriona Brady's life?</p> <p>20 A. Yeah.</p> <p>21 Q. Why?</p> <p>22 A. Well, let's use Caitriona Brady's own</p> <p>23 words.</p> <p>24 Q. Okay.</p> <p>25 A. Brady says she doesn't trust Lisa at</p>
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<p>1 silence them as witnesses; C, obstruct the justice by</p> <p>2 try to prevent the turnover electronic devices to the</p> <p>3 Middle East Forum, and even going so far as to take</p> <p>4 over an enterprise to be able to try to silence them.</p> <p>5 I mean --</p> <p>6 Q. What are you --</p> <p>7 A. -- you have to see --</p> <p>8 Q. -- talking about, Mr. Roman?</p> <p>9 A. She has -- she has been --</p> <p>10 Q. Mr. Roman --</p> <p>11 A. -- so beyond --</p> <p>12 Q. -- stop and let me ask the questions.</p> <p>13 A. Sure.</p> <p>14 Q. I'm going to ask you all about this</p> <p>15 now. Okay?</p> <p>16 A. Sure.</p> <p>17 Q. So stop so we can get -- so we can put</p> <p>18 it in order. Okay?</p> <p>19 So you started by saying she ruined</p> <p>20 different people's lives, and two people you named</p> <p>21 are Dan -- Danny Thomas?</p> <p>22 A. Daniel Thomas.</p> <p>23 Q. Daniel Thomas and --</p> <p>24 A. And Kalina [ph] --</p> <p>25 Q. -- Jazmin --</p>	<p>1 all. That's in MEF Bates numbered document 579, five</p> <p>2 eight -- excuse me, the documents you provided to</p> <p>3 MEF. MEF 579 to 580.</p> <p>4 Q. So you think that --</p> <p>5 A. She says --</p> <p>6 Q. -- because she said that she doesn't --</p> <p>7 A. No, I'm giving you the totality --</p> <p>8 Q. So -- when you say that someone ruined</p> <p>9 --</p> <p>10 A. Yeah, I mean, you want to have me</p> <p>11 answer this I'll answer it why I give you this</p> <p>12 opinion.</p> <p>13 THE COURT REPORTER: One at a</p> <p>14 time. One at a time.</p> <p>15 BY MR. CARSON:</p> <p>16 Q. When you say that someone ruined</p> <p>17 someone's life, that has a pretty specific meaning,</p> <p>18 so --</p> <p>19 A. Yeah --</p> <p>20 Q. -- why is Caitriona Brady's life ruined</p> <p>21 today?</p> <p>22 A. So it's because of the following</p> <p>23 messages that I understand to be the totality of how</p> <p>24 Ms. Barbounis has eventually led Brady to be in a</p> <p>25 position that has really not done so well for her</p>

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<p>1 life. I can continue, Mr. Carson, if you would like 2 me to.</p> <p>3 Q. Do you think Ms. Brady would say that 4 she ruined her life?</p> <p>5 A. I think that Ms. Brady speaks out of 6 one side of her mouth when she's in testimony and 7 perjures herself and then when she's actually 8 speaking with her friends like we see in her text 9 exchanges with Delaney Yonchek, the truth comes out. 10 And if you had reviewed the messages, and maybe you 11 did, maybe you didn't, between Ms. Yonchek and 12 Ms. Brady, we would understand what they actually 13 think about Lisa Barbounis and how they've had a 14 negative detrimental effect on their life, and, more 15 than that, how Lisa introduced Ms. Brady to you, 16 Mr. Carson, and then led her to be in a legally 17 compromising position where she might get sued 18 because of your malpractice, but we can get into that 19 if you really want to go into it. I mean, I don't 20 think Brady would have met you without Lisa 21 Barbounis, but correct me if I'm wrong.</p> <p>22 Q. Why is Caitriona Brady going to get 23 sued?</p> <p>24 A. Well, I'm not saying she's not -- she's 25 in a legally compromising position that may lead her</p>	<p>1 allegation, but we can get there. So you write --</p> <p>2 Q. Her complaint -- Mr. Roman, slow down. 3 Her complaint alleges no sexual harassment 4 whatsoever.</p> <p>5 A. Ms. Brady never alleged sexual 6 harassment against me? That's news to me, 7 Mr. Carson.</p> <p>8 Q. Well, then you didn't read her 9 complaint, Mr. Roman.</p> <p>10 A. What you're saying -- you just said 11 Caitriona Brady's complaint does not allege sexual 12 harassment against me?</p> <p>13 Q. That's correct.</p> <p>14 A. Okay. That's news to me. Like, let's 15 go to the complaint and see what's going on with it. 16 Let's go to the EEOC filing --</p> <p>17 Q. We're starting to have a conversation 18 and not a question-answer --</p> <p>19 A. I'm just saying, you made a statement 20 and I saw it as the form of a question, and I'm 21 trying to get to it.</p> <p>22 Q. So we don't drive the court reporter 23 crazy let's just try not to talk over each other.</p> <p>24 A. Sure.</p> <p>25 Q. It's getting late and it's Friday. I'm</p>
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<p>1 to being sued, but that I guess is something --</p> <p>2 Q. Sued for what?</p> <p>3 A. -- that calls for a legal conclusion. 4 That's something that I think -- well, if we actually 5 go into the conclusion on everything, in that case, 6 Mr. Carson, you --</p> <p>7 Q. Sued -- just sued for what?</p> <p>8 A. I'm getting there in a second. I don't 9 know the legal term for it, but I'll give you the 10 general characterization.</p> <p>11 Q. What's the nonlegal term?</p> <p>12 A. You wrote in Ms. Brady's complaint that 13 I allegedly sexually assaulted Caitriona Brady.</p> <p>14 Q. That's just flat out not true.</p> <p>15 A. Mr. Carson, we can go to the complaint 16 if you would like to and I'll tell you what I'm 17 talking about.</p> <p>18 Q. I mean, we -- look, it's a waste of 19 time because I know exactly what I wrote. Would you 20 like me to --</p> <p>21 A. Okay.</p> <p>22 Q. -- show it to you, though?</p> <p>23 A. I would love to see it. It's in I 24 believe the fourth charge that you offer on Brady, 25 either in the first allegation or the second</p>	<p>1 sure everyone is tired.</p> <p>2 Here, I want to do this quickly, so I'm 3 just going to show it to you just to get -- so first 4 amended complaint, filed second amended complaint -- 5 all right.</p> <p>6 A. Right. Mr. Carson, this is the second 7 complaint. There's also a first complaint. We have 8 to --</p> <p>9 Q. They're all the same, but --</p> <p>10 A. -- look at the complaints.</p> <p>11 Q. -- the -- the only difference in the -- 12 do you see the first one, first -- this is the first 13 amended --</p> <p>14 A. So let's go through this and then we 15 can look at the second one.</p> <p>16 Q. This is all the legal stuff in the 17 case, but --</p> <p>18 A. Seems like there's a lot of files to 19 review.</p> <p>20 Q. Yeah. Just -- all the allegations in 21 the amended complaint are in the first complaint. 22 There's -- the amended complaint has more, not less, 23 so --</p> <p>24 A. Mr. Carson, I have an experience where 25 you say --</p>

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<p>1 Q. I want to -- look, every place where it</p> <p>2 says sex it says discriminated based on her sex and</p> <p>3 gender, right? Discriminated based on her sex and</p> <p>4 gender, sex and gender, sex and gender. It doesn't</p> <p>5 say sexual harassment anywhere in her complaint.</p> <p>6 A. We have to go -- we have to go to her</p> <p>7 deposition to see that --</p> <p>8 Q. Her deposition doesn't allege that</p> <p>9 either.</p> <p>10 A. It does allege that. We can go to the</p> <p>11 history of the deposition that took place. Here we</p> <p>12 go. Gregg Roman's continuous campaign of sexual</p> <p>13 harassment. What do you call that, Mr. Carson?</p> <p>14 Q. Mr. Roman, read it all.</p> <p>15 A. Far beyond the 2018 statute of</p> <p>16 limitations that did not end until November 2018.</p> <p>17 Accordingly, plaintiff claims violations of the</p> <p>18 continuing violations doctrine. You're claiming that</p> <p>19 there is a continuing violation doctrine of sexual</p> <p>20 harassment under sexual harassment laws. Mr. Carson,</p> <p>21 you have to --</p> <p>22 Q. It's a typo.</p> <p>23 A. -- you have -- it's a typo.</p> <p>24 Mr. Carson, you just represented to me that Caitriona</p> <p>25 Brady did not sexually harass --</p>	<p>1 four minutes ago where you said Caitriona Brady never</p> <p>2 accused me of sexual harassment, then you showed me a</p> <p>3 complaint where she accuses me of sexual harassment</p> <p>4 and you're attributing it to a typo. Mr. Carson, the</p> <p>5 law does not allow for typos. You made my</p> <p>6 organization spend hundreds of thousands of dollars</p> <p>7 defending itself against a complaint which resulted</p> <p>8 in accusations against me of harassment because of</p> <p>9 your typo. That my dear Mr. Carson is something</p> <p>10 where I find to be reprehensible and worthy and</p> <p>11 meritorious of you being sued for vexatious conduct,</p> <p>12 for liability which comes out of an abuse of civil</p> <p>13 proceedings, perhaps under the Dragonetti Act, and</p> <p>14 more than that, more than that, you just acted in</p> <p>15 such a way where you found yourself in front of the</p> <p>16 court to be sanctioned not once on July 6th but</p> <p>17 twice.</p> <p>18 Q. Mr. Roman, you don't want to start</p> <p>19 talking about -- that's not going to help your case</p> <p>20 to talk about.</p> <p>21 A. Mr. Carson, you paid my organization --</p> <p>22 Q. Mr. Roman --</p> <p>23 A. Or not paid. You reimbursed my</p> <p>24 organization --</p> <p>25 Q. -- it's not -- not going to help you --</p>
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<p>1 Q. Mr. Roman --</p> <p>2 A. Hold on. Hold on. Hold on. I'm</p> <p>3 telling you what I see here.</p> <p>4 Q. I know you're getting excited,</p> <p>5 Mr. Roman.</p> <p>6 A. I am excited because you just told me</p> <p>7 that your client didn't accuse me of sexual</p> <p>8 harassment and you just showed me a document that</p> <p>9 accuses me of sexual harassment.</p> <p>10 Q. I know, but do you notice the</p> <p>11 difference between her complaint and the others is</p> <p>12 that they all characterize it as discrimination based</p> <p>13 on sex and gender, sex and gender --</p> <p>14 A. Mr. Carson, Mr. Carson, the way in</p> <p>15 which a lawyer speaks out of both sides of his mouth</p> <p>16 is not something that I profess to be an expert in.</p> <p>17 Q. Her complaint --</p> <p>18 A. What I can tell you --</p> <p>19 Q. Just slow --</p> <p>20 A. -- is what you said -- what I can tell</p> <p>21 you --</p> <p>22 Q. Slow down. Slow down.</p> <p>23 A. What I can tell you --</p> <p>24 Q. Her complaint --</p> <p>25 A. -- is what you said to me approximately</p>	<p>1 A. -- over \$5,000 in fees --</p> <p>2 Q. I'm trying to help you right now.</p> <p>3 A. Don't tell me what helps me, Mr.</p> <p>4 Carson --</p> <p>5 Q. It's not going to --</p> <p>6 A. -- I'm trying to help you.</p> <p>7 THE COURT REPORTER: Can't hear</p> <p>8 either of you. Can't hear either of</p> <p>9 you.</p> <p>10 BY MR. CARSON:</p> <p>11 Q. You got to stop. I'm trying to --</p> <p>12 A. Mr. Carson --</p> <p>13 Q. I'm actually trying to help you right</p> <p>14 now.</p> <p>15 A. You can help me as much as you would</p> <p>16 like.</p> <p>17 Q. It's not -- it's not going to --</p> <p>18 A. You can help me as -- you can help me</p> <p>19 as much --</p> <p>20 Q. -- help you to sit here and --</p> <p>21 A. -- you can help me as much as you would</p> <p>22 like, but, Mr. Carson, if you'll just go to paragraph</p> <p>23 --</p> <p>24 Q. Mr. Roman, I'm asking you --</p> <p>25 A. Okay. I'm trying to just -- I'm trying</p>

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<p>1 to get here.</p> <p>2 Q. There's no question --</p> <p>3 A. I'm sorry. I'm going to take a -- I'm</p> <p>4 going to take a breath. I'm going to take a breath.</p> <p>5 Okay?</p> <p>6 THE COURT REPORTER: This is --</p> <p>7 okay. Stop. Please.</p> <p>8 THE WITNESS: I'm going to breathe</p> <p>9 in. I'm going to drink some water. I'm</p> <p>10 going to calm down. Okay?</p> <p>11 MR. GOLD: Why don't we take a</p> <p>12 five-minute break.</p> <p>13 THE WITNESS: Do you want to take</p> <p>14 a break? Take a break.</p> <p>15 THE VIDEO SPECIALIST: We're off</p> <p>16 the record. It's 5:47 p.m. Eastern.</p> <p>17 (A brief recess was taken.)</p> <p>18 THE VIDEO SPECIALIST: It's 5:59</p> <p>19 p.m. and we're back on the record.</p> <p>20 MR. CARSON: Yeah, for the record,</p> <p>21 Mr. Gold, when you give your -- when you</p> <p>22 tell your client what to say during a</p> <p>23 deposition in the middle of a deposition</p> <p>24 you should put yourself on mute.</p> <p>25 Everyone can hear you giving your client</p>	<p>1 A. -- admitted under oath didn't happen.</p> <p>2 Q. -- sexual assault, Mr. Roman?</p> <p>3 A. 364 and 366, second amended complaint</p> <p>4 and first amended complaint --</p> <p>5 Q. 364 of the what?</p> <p>6 A. 364 of the second amended complaint and</p> <p>7 366 in the first amended complaint. Is that also a</p> <p>8 typo?</p> <p>9 Q. 364 of the second amended complaint.</p> <p>10 A. Correct.</p> <p>11 Q. Defendant Middle East Forum breached</p> <p>12 its duty of care and this directly caused the sexual</p> <p>13 assault of plaintiff Caitriona Brady, yes, yeah, it</p> <p>14 is a typo actually.</p> <p>15 A. So you made a typo in your complaint</p> <p>16 accusing me of sexual assault.</p> <p>17 Q. Your client -- your lawyer --</p> <p>18 A. I don't have a client.</p> <p>19 Q. Your lawyers understood the entire time</p> <p>20 we've litigated this case that there was never a</p> <p>21 sexual assault --</p> <p>22 A. Mr. Carson, this is what I understand.</p> <p>23 I understand that you filed a public document --</p> <p>24 Q. I didn't ask -- I didn't ask a question</p> <p>25 yet.</p>
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<p>1 advice.</p> <p>2 BY MR. CARSON:</p> <p>3 Q. But to continue the deposition,</p> <p>4 Mr. Roman, can you hear me?</p> <p>5 A. Yes.</p> <p>6 Q. Do you understand sitting here today</p> <p>7 that neither Caitriona Brady nor Delaney Yonchek ever</p> <p>8 accused you of sexual assault or sexual harassment?</p> <p>9 A. I would point you to Paragraph 364 in</p> <p>10 the second amended complaint of Ms. Brady</p> <p>11 allegations --</p> <p>12 Q. Yeah, did you read --</p> <p>13 A. -- and Paragraph --</p> <p>14 Q. -- the rest of the complaint?</p> <p>15 A. -- and Paragraph 366 of the first</p> <p>16 amended complaint, and if you would like me to be</p> <p>17 able to comment on that we can read the paragraphs --</p> <p>18 Q. No, I don't need you to comment. Do</p> <p>19 you understand that the rest of the complaint alleges</p> <p>20 sex and gender discrimination throughout?</p> <p>21 A. I understand in part it alleges sex and</p> <p>22 gender discrimination, but it also alleges sexual</p> <p>23 harassment and sexual assault, two things which your</p> <p>24 client --</p> <p>25 Q. Where does it allege --</p>	<p>1 A. Okay. You asked me where it says it, I</p> <p>2 told you where you said it, you just read it, it says</p> <p>3 that you accused me of sexual assault --</p> <p>4 Q. There is no question on the record.</p> <p>5 This isn't a conversation.</p> <p>6 A. I'm not saying --</p> <p>7 Q. It's not a conversation.</p> <p>8 A. I took that as a question. I apologize</p> <p>9 if I mischaracterized your statement.</p> <p>10 MR. CAVALIER: I am going to state</p> <p>11 for the record that your categorization</p> <p>12 of what Mr. Roman's lawyers understood</p> <p>13 throughout the entirety of this case is</p> <p>14 inaccurate.</p> <p>15 MR. CARSON: It's not inaccurate</p> <p>16 at all. You guys didn't ask one</p> <p>17 question at her deposition about a</p> <p>18 sexual assault.</p> <p>19 MR. CAVALIER: That's false.</p> <p>20 MR. CARSON: No, it's not. I'm</p> <p>21 going to continue, though.</p> <p>22 BY MR. CARSON:</p> <p>23 Q. So to continue this -- this deposition,</p> <p>24 so after the AIPAC conference in -- strike that.</p> <p>25 After the trip to Israel that you made</p>



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<p>1 sure Daniel Pipes didn't know about, when did you get 2 back to Philadelphia?</p> <p>3 A. I don't remember the exact date, Mr. 4 Carson.</p> <p>5 Q. And what was the month?</p> <p>6 A. Mr. Carson, I went on trips which took 7 me overseas and outside of Philadelphia over a 8 hundred days in 2018.</p> <p>9 Q. Well, approximately what month.</p> <p>10 A. I don't remember, Mr. Carson.</p> <p>11 Q. Well, when did you go to Israel with 12 Ms. Barbounis?</p> <p>13 A. Well, I stayed in Israel after their 14 departure, so I don't remember when I came back.</p> <p>15 Q. You didn't fly back with Ms. Barbounis?</p> <p>16 A. No, Mr. Carson.</p> <p>17 Q. When did you fly back?</p> <p>18 A. I don't remember, Mr. Carson.</p> <p>19 Q. Well, what month was it when you went?</p> <p>20 A. March, Mr. Carson.</p> <p>21 Q. It was March of what?</p> <p>22 A. 2018, Mr. Carson.</p> <p>23 Q. Okay. So were you back in April?</p> <p>24 A. I may have been back in Philadelphia 25 sometime between March and April of 2018 -- actually,</p>	<p>1 Q. It was a yes or no question. Did you 2 get back in April 2018?</p> <p>3 A. Well, if I'm talking about the sexual 4 harassment seminar that I participated in in April 5 2018 --</p> <p>6 Q. I'm not asking you about that.</p> <p>7 A. -- that means that I was back.</p> <p>8 Q. Okay. So you participated -- yes or 9 no, you participated in the sexual harassment seminar 10 in April 2018; is that correct?</p> <p>11 A. That's correct.</p> <p>12 Q. Did you work in Philadelphia in May of 13 2018?</p> <p>14 A. There may have been days that I was in 15 the office, there may not have been.</p> <p>16 Q. Well, at that time you were permitted 17 to go to the office whenever you wanted, correct?</p> <p>18 A. Right, but I don't know if I was in the 19 office in May of 2018. I'm sure there was days that 20 I was there. It was actually when we had the 21 planning discussions around Tommy Robinson and his 22 rally in late May of 2018, that's when I authorized 23 Lisa and Tricia to travel to London. So, yes, I was 24 in Philadelphia at least once in May of 2018.</p> <p>25 Q. You were in Philadelphia quite a bit in</p>
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<p>1 yes. Actually yes. In April of 2018 the Middle East 2 Forum held a sexual harassment seminar that was led 3 by -- I specifically remember this. It was led by 4 Marnie Meyer. She had brought in a New Jersey state 5 approved sexual harassment guide or whatever. I 6 specifically remember Lisa Barbounis was there in the 7 conference room. Tricia McNulty was there in the 8 conference room. Brady, I don't know if she was 9 working for us yet. Yonchek I think may have been 10 working for us. And Marnie Meyer held the sexual 11 harassment seminar. All the staff invited from all 12 over the country was either participating in the 13 office in Philadelphia or via Skype for business, and 14 there was an element there where I said members of 15 MEF staff -- I'm paraphrasing this now to the best of 16 my recollection -- if there are any incidents of 17 sexual harassment that you are aware of or if you 18 ever become aware of them, this is the following 19 procedure of what you have to do, and this is also 20 codified in our personnel manual.</p> <p>21 Q. Mr. Roman, you do understand that the 22 question I asked you is when did you get back and 23 then I said did you get back in April.</p> <p>24 A. Well, I'm saying what happened is when 25 I got back.</p>	<p>1 April and May of 2018, correct?</p> <p>2 A. I don't know about that 3 characterization, Mr. Carson. I have to check my 4 calendar.</p> <p>5 Q. Where do you think you were?</p> <p>6 A. Well, I traveled to -- when is this, 7 April of 2018? I think I was in Hawaii for three 8 weeks. I think I was in California. I was in 9 Seattle.</p> <p>10 Q. When were you in Hawaii?</p> <p>11 A. I was in Paris.</p> <p>12 Q. Just -- you're going to have to take it 13 one by one. When were you in Hawaii?</p> <p>14 A. Would it be proper for me to consult my 15 calendar so I give you the exact dates?</p> <p>16 Q. No, I mean, just --</p> <p>17 A. I can give you the exact dates.</p> <p>18 Q. All right. Fine. Look at your 19 calendar.</p> <p>20 A. Okay. Give me a second. Just have to 21 go back two years. I hope it's here.</p> <p>22 THE WITNESS: Mr. Cavalier, do you 23 have that calendar?</p> <p>24 MR. CARSON: Can't ask questions 25 of your counsel.</p>

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<p>1 THE WITNESS: Mr. Carson, do you</p> <p>2 mind if I ask Mr. Cavalier to provide a</p> <p>3 calendar if I can't find it?</p> <p>4 MR. CARSON: If you can't find it</p> <p>5 in your calendar for now, I'll just ask</p> <p>6 you to produce it.</p> <p>7 THE WITNESS: There we go. I left</p> <p>8 for Hawaii --</p> <p>9 BY MR. CARSON:</p> <p>10 Q. Sometime around blank blank.</p> <p>11 A. I left for Hawaii on March twenty --</p> <p>12 well, that was Passover, so we had the seder, I</p> <p>13 didn't work at all, I was in D.C. then, so I was out</p> <p>14 of the office starting like March 25th, Hawaii was</p> <p>15 through -- I was in Paris with Daniel -- I was in the</p> <p>16 office it looks like three times in April of 2018.</p> <p>17 Q. Three -- you were where?</p> <p>18 A. In Philadelphia, in the Philadelphia</p> <p>19 office, I have here three times in April of 2018.</p> <p>20 You characterized me as being in the office a lot. I</p> <p>21 wouldn't call three times a lot, Mr. Carson.</p> <p>22 Q. Well, do you have any proof that you</p> <p>23 were away during these trips?</p> <p>24 A. Yes, I probably have plane tickets, I</p> <p>25 probably have the hotel reservations that Lisa</p>	<p>1 Q. Okay. How long were you in Israel?</p> <p>2 A. I was in -- I was in Israel for ten</p> <p>3 days in May of 2018, I was in California for eight</p> <p>4 days in May of 2018 -- so for more than half the</p> <p>5 month, at least from the calendar here, I was</p> <p>6 traveling, Mr. Carson. So the statement that I was</p> <p>7 in the office a lot in April and May of 2018 is</p> <p>8 incorrect. I was -- had a de minimis presence in the</p> <p>9 office in April and May of 2018.</p> <p>10 Q. If you can prove that with records,</p> <p>11 we'll definitely look at the records, so I'll ask</p> <p>12 that you produce all -- any and all records for</p> <p>13 travel between March of 2018 and November of 2018.</p> <p>14 A. Yeah, to the extent that I have them,</p> <p>15 Mr. Carson. I also think you should -- to the extent</p> <p>16 that I have it, Mr. Carson, and also to your own</p> <p>17 client's recollection of the travel that she booked</p> <p>18 for me during that time, I would be glad to provide</p> <p>19 that to you.</p> <p>20 Q. Is it your deposition testimony today</p> <p>21 under oath that my client booked all your hotel rooms</p> <p>22 for your travel?</p> <p>23 A. No, it's not.</p> <p>24 Q. So why would she know about your</p> <p>25 vacations then?</p>
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<p>1 Barbounis booked for me, I probably have --</p> <p>2 Q. It was a yes or no question.</p> <p>3 A. -- travel records.</p> <p>4 Q. It was a yes or no question.</p> <p>5 A. Yes, and, by the way, Lisa's six month</p> <p>6 review took place on April 19th, 2018.</p> <p>7 Q. And you were in Philly for that?</p> <p>8 A. I was, and I was also in Philadelphia</p> <p>9 for the sexual harassment seminar that took place on</p> <p>10 -- it was 10 a.m. on April 17th, 2018.</p> <p>11 Q. Say that date again?</p> <p>12 A. 10 a.m., April 17th, 2018.</p> <p>13 Q. How about in May 2018?</p> <p>14 A. May -- sorry, I have to correct myself,</p> <p>15 Mr. Carson. Ms. Barbounis's review was not on April</p> <p>16 19th. It was on May 3rd, 2018. My apologies.</p> <p>17 Q. So you were in the office on May 3rd,</p> <p>18 2018, correct?</p> <p>19 A. Yeah.</p> <p>20 Q. What about June and July, you were in</p> <p>21 the office June and July, right?</p> <p>22 A. No, I wasn't, Mr. Carson, not that</p> <p>23 much. I was traveling to Israel, to California. I</p> <p>24 actually spent -- I spent a good amount of my time in</p> <p>25 May in Israel as well.</p>	<p>1 A. Well, she controlled my calendar,</p> <p>2 Mr. Carson. I would book the hotel, she would put it</p> <p>3 on the calendar.</p> <p>4 Q. Okay.</p> <p>5 A. She was my assistant or what we call</p> <p>6 the executive liaison.</p> <p>7 Q. Okay. You mentioned that Lisa</p> <p>8 Barbounis went to London around March of 2018? April</p> <p>9 --</p> <p>10 A. No, Mr. Carson.</p> <p>11 Q. -- 2018?</p> <p>12 A. No, Mr. Carson.</p> <p>13 Q. Where did she go?</p> <p>14 A. When did she go where, Mr. Carson?</p> <p>15 Q. Where did she go to London?</p> <p>16 A. Where? She went to London. That's</p> <p>17 where she went.</p> <p>18 Q. Right. When did she go to London?</p> <p>19 Sorry.</p> <p>20 A. She's been to London multiple times,</p> <p>21 Mr. Carson.</p> <p>22 Q. Talking about in April of 2018.</p> <p>23 A. Ms. Barbounis to the best of my</p> <p>24 knowledge was not in London in April of 2018,</p> <p>25 Mr. Carson.</p>

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<p>1 Q. Was she there in May of 2018?</p> <p>2 A. No, Mr. Carson.</p> <p>3 Q. Was she there in June of 2018?</p> <p>4 A. I believe so, Mr. Carson.</p> <p>5 Q. Okay. Was that the first time she went</p> <p>6 there?</p> <p>7 A. I don't know, Mr. Carson, if she</p> <p>8 traveled to London before June of 2018.</p> <p>9 Q. Well, related to her work at the Middle</p> <p>10 East Forum is that the first time she went there?</p> <p>11 A. To the best of my knowledge, yes, Mr.</p> <p>12 Carson.</p> <p>13 Q. Okay. Why did she go there?</p> <p>14 A. Why did she go to London?</p> <p>15 Q. Yeah.</p> <p>16 A. Well, there's a few ways to answer</p> <p>17 that. Why did the organization send her or why did</p> <p>18 she go? I can't answer the reasons why she</p> <p>19 personally --</p> <p>20 Q. Best of your ability, okay, why did she</p> <p>21 go to London in connection with her employment at the</p> <p>22 Middle East Forum?</p> <p>23 A. So she went -- she went for two</p> <p>24 reasons. The first reason of a personal nature was</p> <p>25 to start to be what I consider to be a year and a</p>	<p>1 Q. Did she ever --</p> <p>2 A. Marnie Meyer -- Marnie Meyer --</p> <p>3 Q. It's a yes or no question.</p> <p>4 A. -- disagreed -- I'm answering your</p> <p>5 question, Mr. Carson.</p> <p>6 Q. My question is, did she ever work in</p> <p>7 the role of deputy chief of staff in her life for the</p> <p>8 Middle East Forum?</p> <p>9 A. Her responsibilities --</p> <p>10 Q. It's a yes or no question.</p> <p>11 A. Mr. Carson, it's more complicated than</p> <p>12 that.</p> <p>13 Q. Was she ever the deputy chief of staff?</p> <p>14 Why is that hard for you to answer?</p> <p>15 A. We talked about this -- we talked about</p> <p>16 this at the beginning of the deposition. Names,</p> <p>17 titles, and responsibilities at MEF are all relative</p> <p>18 to the position that someone has according to the day</p> <p>19 that they had that position.</p> <p>20 Q. Well, was she --</p> <p>21 A. She started off --</p> <p>22 Q. Mr. Roman --</p> <p>23 THE COURT REPORTER: I can't hear</p> <p>24 you.</p> <p>25 BY MR. CARSON:</p>
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<p>1 half fraud she enacted against MEF, and the second</p> <p>2 reason is because she was charged with overseeing a</p> <p>3 tens of thousands of dollar grant that was given to</p> <p>4 the convicted criminal Daniel Thomas that she had</p> <p>5 suggested we give that money to.</p> <p>6 Q. Who approved that -- who approved that</p> <p>7 grant?</p> <p>8 A. Based on the representations that Ms.</p> <p>9 Barbounis gave to me, it was approved by me, Marnie</p> <p>10 Meyer, and Daniel Pipes, of which the fiduciary</p> <p>11 responsibility fell on Ms. Barbounis's lap. She had</p> <p>12 been asking for more responsibility. She got it and</p> <p>13 then she abused it.</p> <p>14 Q. You said she was an executive liaison</p> <p>15 at that time, a secretary basically, correct?</p> <p>16 A. She was on her track to being promoted</p> <p>17 to a deputy chief of staff position.</p> <p>18 Q. Had she been promoted to deputy chief</p> <p>19 of staff?</p> <p>20 A. She was promoted after she made false</p> <p>21 allegations against me.</p> <p>22 Q. She was demoted -- she was promoted to</p> <p>23 deputy chief of staff?</p> <p>24 A. She was on her way to being promoted to</p> <p>25 deputy chief of staff.</p>	<p>1 Q. -- I'm going to ask the question,</p> <p>2 you're going to answer --</p> <p>3 A. I'm answering your question.</p> <p>4 Q. No, you're not. You're interrupting</p> <p>5 and you're causing problems with the court reporter.</p> <p>6 Okay? So what the question is is was she ever</p> <p>7 afforded the position, role, title, anything, deputy</p> <p>8 chief of staff?</p> <p>9 A. Yes.</p> <p>10 Q. When?</p> <p>11 A. She was afforded the responsibilities</p> <p>12 that would have gone along with the title of deputy</p> <p>13 chief of staff had she not lied and subjected herself</p> <p>14 --</p> <p>15 Q. When? The answer was -- the question</p> <p>16 was when.</p> <p>17 A. Mr. Carson, I'm answering your</p> <p>18 question.</p> <p>19 Q. No, you're not. You just said yes --</p> <p>20 Mr. Roman --</p> <p>21 A. I'm giving you my answer.</p> <p>22 Q. No, no, no, you're not. Because it was</p> <p>23 -- I asked you when. I asked for a date.</p> <p>24 A. Mr. Carson --</p> <p>25 Q. Wait and let me ask the question for</p>

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<p>1 the record and then the court reporter will type one</p> <p>2 person saying the question and then your attorney's</p> <p>3 welcome to object, and then you're welcome to give</p> <p>4 your answer, and the answer is a date. When did Ms.</p> <p>5 Barbounis assume the role deputy chief of staff?</p> <p>6 A. Mr. Carson, she did not assume the role</p> <p>7 of deputy chief of staff; she assumed the</p> <p>8 responsibilities of someone if they had proven</p> <p>9 themselves would eventually have been on the track to</p> <p>10 be promoted to deputy chief of staff.</p> <p>11 Q. And you think --</p> <p>12 A. The date would have been --</p> <p>13 Q. And you think that's the same thing?</p> <p>14 A. The date would have been --</p> <p>15 Q. You think that's a promotion?</p> <p>16 A. Hundred percent, Mr. Carson, especially</p> <p>17 if you look at the correspondence between myself and</p> <p>18 Ms. Barbounis, which you should have.</p> <p>19 Q. Okay.</p> <p>20 A. On May 3rd, two thousand -- I'll stop</p> <p>21 answering if you would like me to.</p> <p>22 Q. Yeah, you should. I think --</p> <p>23 A. I should what, Mr. Carson?</p> <p>24 Q. So give me the date when she was given</p> <p>25 the position of deputy chief of staff.</p>	<p>1 raise.</p> <p>2 A. You would have to ask her, Mr. Carson.</p> <p>3 I was not part of administration of MEF.</p> <p>4 Q. So you don't know --</p> <p>5 A. She actually did -- she did receive a</p> <p>6 pay raise when she was at MEF, yes.</p> <p>7 Q. That wasn't my question. My question</p> <p>8 was did she ever get a pay raise to go along with</p> <p>9 these so-called responsibilities that she received</p> <p>10 that made her have a deputy chief of staff title.</p> <p>11 A. She never had the title of deputy chief</p> <p>12 of staff.</p> <p>13 Q. Did she ever receive a pay raise in</p> <p>14 connection with the responsibilities?</p> <p>15 A. Yes, Mr. Carson.</p> <p>16 Q. When? When did she get the pay raise?</p> <p>17 A. After I was removed from the</p> <p>18 administration of the organization.</p> <p>19 Q. How much was this pay raise?</p> <p>20 A. I don't know, Mr. Carson.</p> <p>21 Q. How do you know she got it then?</p> <p>22 A. Because it's in the documents afforded</p> <p>23 to the litigation. I can review it and give you a</p> <p>24 specific answer if you like.</p> <p>25 Q. Well, aren't you talking about an</p>
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<p>1 A. She was never given the position of</p> <p>2 deputy chief of staff --</p> <p>3 Q. Okay. So give me the date when she was</p> <p>4 given the responsibilities of a deputy chief of</p> <p>5 staff.</p> <p>6 A. It started when she was in Israel,</p> <p>7 Mr. Carson.</p> <p>8 Q. So started in March of 2018?</p> <p>9 A. Yes, and gradually she got more and</p> <p>10 more responsibilities until there was a discussion in</p> <p>11 early October of 2018 where Daniel Pipes informed me</p> <p>12 that I was going to be eventually promoted to</p> <p>13 president of the organization when he was planning on</p> <p>14 retiring, and the first person that I told was Lisa</p> <p>15 Barbounis.</p> <p>16 Q. Okay. Was -- did Ms. Barbounis ever</p> <p>17 receive a pay raise for this position or these</p> <p>18 responsibilities?</p> <p>19 A. She received a pay raise I believe in</p> <p>20 November of 2018, but I wasn't part of that since all</p> <p>21 of my administrative responsibilities were removed on</p> <p>22 November 6th, 7th, or 8th of that year. And, by the</p> <p>23 way, those responsibilities never came back while she</p> <p>24 was employed at Middle East Forum.</p> <p>25 Q. I asked you did she ever receive a pay</p>	<p>1 amount of money that every single female employee at</p> <p>2 the Middle East Forum received?</p> <p>3 A. Mr. Carson, I wasn't part of that</p> <p>4 decision. I was out of the administration of the</p> <p>5 Middle East Forum after Daniel Pipes removed me from</p> <p>6 the responsibilities that were previously afforded to</p> <p>7 the position of director in early November of 2018</p> <p>8 and I never assumed those responsibilities until</p> <p>9 Marnie Meyer left the organization in February of</p> <p>10 2020, so I had a good 16-month period where I was not</p> <p>11 involved in the formal administration of MEF as a</p> <p>12 result of Lisa Barbounis's complaint.</p> <p>13 Q. What was her position in April of 2018?</p> <p>14 She was an executive liaison, correct?</p> <p>15 A. No, her title was executive liaison,</p> <p>16 but her responsibilities were incrementally given</p> <p>17 more and more as month and month went by. She made</p> <p>18 this very clear to us in communications in May of</p> <p>19 2018.</p> <p>20 Q. She was what?</p> <p>21 A. She made it very clear and known to the</p> <p>22 management of the Middle East Forum in conversations</p> <p>23 with Daniel Pipes and with myself that she wanted</p> <p>24 more responsibilities beyond what was originally</p> <p>25 afforded to her in her job description when she was</p>



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<p>1 hired in -- it was October, November of 2017. She  2 assumed those responsibilities and were given more  3 portfolios. For instance, she was given --  4 Q. You don't have to give me a for  5 instance.  6 A. No, I'm just giving you an example so  7 you can --  8 Q. It's not necessary.  9 A. -- comparison.  10 Q. It's really not --  11 A. She was given Tommy Robinson when she  12 asked for more responsibilities. She traveled  13 internationally, she handled foreign clients, she  14 handled members of congress, members of parliament,  15 but little did we know that she was abusing those new  16 responsibilities that she got.  17 Q. How did she abuse them?  18 A. There was multiple ways.  19 Q. Give me one.  20 A. She tried to hire hackers to get  21 information from the organization.  22 Q. What hacker did she try to hire?  23 A. Well, if you look at her  24 correspondence --  25 Q. Mr. Roman, I'm not asking you to refer</p>	<p>1 THE WITNESS: -- at the beginning  2 of this deposition I'll give to you.  3 MR. CARSON: -- explain to your  4 client that he needs to put the document  5 away?  6 MR. CAVALIER: You want him to  7 have less information for the  8 deposition?  9 MR. CARSON: Jon, I'm not going to  10 ask twice. It's totally inappropriate  11 for him to be pulling out documents from  12 folders and reading them to me.  13 THE WITNESS: Mr. Carson, these  14 are documents you gave to us.  15 MR. CARSON: Jon, are you going to  16 direct your client to put the document  17 away? Yes or no?  18 MR. GOLD: Unless you need to  19 refer to a document to refresh your  20 memory.  21 MR. CARSON: You do not get to  22 refer to documents unless -- unless  23 they're exhibits that I hand you.  24 MR. GOLD: You can post them if  25 you wish.</p>
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<p>1 to documents. I asked you what hacker did she try to  2 hire.  3 A. This is what I'm referring to.  4 Q. Yeah, you're not -- I need you to put  5 that down. Okay? It's not --  6 A. Why?  7 Q. -- an exhibit.  8 A. No, this is documents I brought to the  9 deposition.  10 Q. It's not an exhibit that you can -- you  11 got to stop and you got to put it down.  12 A. Well, Mr. Carson, you're asking me a  13 question --  14 Q. It's not an exhibit. Yeah --  15 A. I'm answering your question. You asked  16 me -- I'm referring to a document I brought to answer  17 that.  18 Q. You're not allowed --  19 A. Would you like me to do that?  20 Q. -- to have documents surrounding you  21 that you refer to during a deposition.  22 A. They're not surrounding me, Mr. Carson.  23 I have a few exhibits that I said --  24 MR. CARSON: Guys, can you please  25 --</p>	<p>1 THE WITNESS: Sure. I can put  2 them on the screen if you want.  3 MR. CARSON: No. No, no, no.  4 We're not looking at that document. Put  5 it away.  6 THE WITNESS: Mr. Carson, you  7 asked me when I believe Mr. -- Ms.  8 Barbounis hired a hacker to go after  9 Middle East Forum data.  10 BY MR. CARSON:  11 Q. Answer the question. When did she hire  12 a hacker?  13 A. She suggested hiring a hacker on  14 November 15th, 2018, in a conversation with Tricia  15 McNulty. She then did it again on March 4th, 2019,  16 saying we have a hacker trying to get his data from  17 Facebook as a workaround. So she's talking about a  18 hacker. She does it twice, once in November of 2018,  19 once in March of 2019. I don't believe you've given  20 us who that hacker is in your production for your  21 discovery, but I would love to know and I can offer  22 you a better answer.  23 Q. Do you even know what you're talking  24 about right now, Mr. Roman?  25 A. I'm talking about a hacker that I</p>

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<p>1 believe Ms. Barbounis hired to try to sabotage the</p> <p>2 Middle East Forum.</p> <p>3 Q. Mr. Roman, do you have a hard time</p> <p>4 keeping up with your lies?</p> <p>5 A. Mr. Carson, I'm quoting -- first of</p> <p>6 all, they're not lies. Second of all, I'm quoting</p> <p>7 from documents that you provided to the Middle East</p> <p>8 Forum in discovery. These are documents you gave to</p> <p>9 us to review. So I'm just quoting --</p> <p>10 Q. My question was --</p> <p>11 A. -- from your documents.</p> <p>12 Q. -- do you have a hard time keeping</p> <p>13 track of all your lies.</p> <p>14 A. Mr. Carson, you have to look at the</p> <p>15 documentation, and this is I believe the ninth or</p> <p>16 tenth time that you've accused me of lying throughout</p> <p>17 all these processions. I believe it's a violation of</p> <p>18 Rule 4 of the rules of professional responsibility</p> <p>19 for you to make a misrepresentation on the record,</p> <p>20 and I think it's abhorrent that you're being</p> <p>21 unethical --</p> <p>22 Q. What question are you --</p> <p>23 A. -- in your conduct of the procession.</p> <p>24 Q. -- answering right now? What question</p> <p>25 are you answering right now?</p>	<p>1 A. -- she --</p> <p>2 Q. Mr. Roman --</p> <p>3 A. -- she -- she asked --</p> <p>4 Q. I asked you a yes or no question. When</p> <p>5 you're done saying yes or no, I'll ask another</p> <p>6 question. Okay?</p> <p>7 A. Well, Mr. Carson, that is not a yes or</p> <p>8 no question.</p> <p>9 Q. Did she go --</p> <p>10 A. It's more complicated than that.</p> <p>11 Q. -- as part of her responsibilities as</p> <p>12 an executive liaison?</p> <p>13 A. Yes and no.</p> <p>14 Q. Okay. Why do --</p> <p>15 A. She went because she -- she volunteered</p> <p>16 to go. Okay? She asked for permission. And then</p> <p>17 what she did is she got a reimbursement from the</p> <p>18 Middle East Forum and lied to our organization to</p> <p>19 redirect \$5,000 in a grant that went from us to</p> <p>20 Raheem Kassam and then was paid to her husband to</p> <p>21 cover travel that was unapproved. So she wanted to</p> <p>22 go, but then she lied about covering the cost for</p> <p>23 that and then defrauded the organization out of</p> <p>24 \$5,000. So that's really the totality of the answer</p> <p>25 I can provide to you. And there is text messages</p>
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<p>1 A. I'm answering the question that you</p> <p>2 asked are you --</p> <p>3 Q. It's a yes or no question.</p> <p>4 A. -- are you aware -- are you keeping</p> <p>5 track of the lies. That's what you said.</p> <p>6 Q. Right. Are you keeping --</p> <p>7 A. And I'm saying --</p> <p>8 Q. -- track of all your lies?</p> <p>9 A. I'm saying that --</p> <p>10 Q. Yes or no?</p> <p>11 A. -- number one, they are not lies --</p> <p>12 Q. Right. I'm going to --</p> <p>13 A. -- and, number two --</p> <p>14 Q. -- withdraw the question. All right?</p> <p>15 So we're going to move on now.</p> <p>16 A. Okay.</p> <p>17 Q. Mr. Roman, you said that when Lisa</p> <p>18 Barbounis went to -- you said that when Lisa</p> <p>19 Barbounis went to Europe in June of 2018 it was at</p> <p>20 your direction, correct?</p> <p>21 A. She -- well, yes and no.</p> <p>22 Q. Yes or no, did you say that?</p> <p>23 A. Yes -- no, yes and no. What I'm saying</p> <p>24 is --</p> <p>25 Q. No, no --</p>	<p>1 that you provided to us that proves that.</p> <p>2 Q. Yeah. It's funny that you think -- all</p> <p>3 right. Anywho, so -- so, Mr. Roman, when she went to</p> <p>4 Europe she went to witness a rally that -- that was</p> <p>5 put on because of a grant that the Middle East Forum</p> <p>6 made to Danny Thomas and Tommy Robinson; is that</p> <p>7 correct?</p> <p>8 A. That's incorrect.</p> <p>9 Q. Why is it incorrect?</p> <p>10 A. Because the grant wasn't made to Danny</p> <p>11 Thomas and to Tommy Robinson.</p> <p>12 Q. Who was it made to?</p> <p>13 A. The grant was made to a movement that</p> <p>14 Ms. Barbounis said --</p> <p>15 Q. What's the name of the movement?</p> <p>16 A. Well, if you want to call it an</p> <p>17 enterprise -- I wouldn't call it a movement per se; I</p> <p>18 would call it an enterprise that constituted about 15</p> <p>19 to 20 different people.</p> <p>20 Q. Well, Mr. Roman, Lisa has nothing to do</p> <p>21 with money at the Middle East Forum, correct?</p> <p>22 A. She definitely has something to do with</p> <p>23 money at the Middle East Forum.</p> <p>24 Q. She does?</p> <p>25 A. Yeah.</p>

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<p>1 Q. She -- so she sends wires out and she</p> <p>2 makes sure that the books are straight --</p> <p>3 A. Yes.</p> <p>4 Q. -- as part of her responsibility?</p> <p>5 A. Ms. Barbounis made a recommendation in</p> <p>6 early June of 2018 to transfer tens of thousands of</p> <p>7 dollars to Mr. Daniel Thomas and then, as in --</p> <p>8 e-mails indicate, and you'll see this was a constant</p> <p>9 pattern from June of 2018 until --</p> <p>10 Q. I'm not --</p> <p>11 A. -- her departure --</p> <p>12 Q. -- asking you about a pattern; I'm</p> <p>13 asking you --</p> <p>14 A. You're asking me if she was responsible</p> <p>15 for money, and I'm giving you an answer.</p> <p>16 Q. I'm asking if she was responsible for</p> <p>17 actually sending money out. Did she -- was she the</p> <p>18 person who said, all right, I'm going to send this</p> <p>19 money now; is that part of her job?</p> <p>20 A. What she said was --</p> <p>21 Q. Yes or no?</p> <p>22 A. -- we should send money -- what she</p> <p>23 said was -- I can't say yes or no to something that</p> <p>24 didn't happen.</p> <p>25 Q. Right. Did -- was that one of her</p>	<p>1 those receipts to me afterwards and --</p> <p>2 Q. She provided what receipts to you</p> <p>3 afterwards?</p> <p>4 A. The receipts that Mr. Thomas allegedly</p> <p>5 gave to Ms. Barbounis.</p> <p>6 Q. Ms. -- Daniel Thomas gave Ms. Barbounis</p> <p>7 receipts that she gave to you; is that your</p> <p>8 testimony?</p> <p>9 A. Right, that -- what she did was she</p> <p>10 said that these were receipts, and that accounted for</p> <p>11 a portion of the money, but the sum total of the</p> <p>12 money -- if you take the total amount of money that</p> <p>13 came from what was given --</p> <p>14 Q. Mr. Roman --</p> <p>15 A. I'm giving you an answer.</p> <p>16 Q. No, you're not.</p> <p>17 A. I'm giving you an answer. Yes, I am.</p> <p>18 Q. No, you're not. All right?</p> <p>19 A. There is receipts --</p> <p>20 Q. Listen to the question before --</p> <p>21 THE COURT REPORTER: One at a</p> <p>22 time.</p> <p>23 BY MR. CARSON:</p> <p>24 Q. The question is, did Daniel Thomas give</p> <p>25 receipts to Lisa that she then gave you; is that what</p>
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<p>1 responsibilities or did you have a bookkeeper at the</p> <p>2 time who did that?</p> <p>3 A. No, she recommended the money be</p> <p>4 transferred. I approved --</p> <p>5 Q. Who did she make the recommendation to?</p> <p>6 A. I approved that recommendation based on</p> <p>7 her representations.</p> <p>8 Q. Who else approved --</p> <p>9 A. And then the money was sent by Marnie</p> <p>10 Meyer.</p> <p>11 Q. Correct. Who else approved the</p> <p>12 recommendation? Daniel Pipes?</p> <p>13 A. Yeah, he would approve some</p> <p>14 recommendations and others he wouldn't be involved</p> <p>15 with.</p> <p>16 Q. Was he involved in this one?</p> <p>17 A. I don't remember.</p> <p>18 Q. Okay. When you approved it what did</p> <p>19 you approve it based on?</p> <p>20 A. I approved it based on quotes that</p> <p>21 Daniel Thomas gave to Lisa Barbounis and then from</p> <p>22 those quotes she said I believe that we should send X</p> <p>23 amount of money to Mr. Thomas, and I said are you</p> <p>24 going to be able to keep track of those receipts and</p> <p>25 the spending, and she said yes, and then she provided</p>	<p>1 you're saying?</p> <p>2 A. He gave partial receipts, and then he</p> <p>3 also gave an accounting --</p> <p>4 Q. What is a partial receipt?</p> <p>5 A. Okay. So I'll give you an example.</p> <p>6 Let's say I give you a hundred dollars. Okay? And I</p> <p>7 ask you to go buy a stack of books. All right? So</p> <p>8 you go buy the books. They cost \$80. And then on</p> <p>9 your way back to the office you buy a Big Mac and you</p> <p>10 have a \$6 Big Mac. And then you go buy a pack of gum</p> <p>11 and you get something else. So you spent \$80 on the</p> <p>12 books, that's what you have the receipt for, but you</p> <p>13 bought yourself a Big Mac and a pack of gum but you</p> <p>14 didn't give me those receipts. So you gave me</p> <p>15 partial receipts for 80 percent of the total that you</p> <p>16 were allocated and you represented that you spent the</p> <p>17 rest of the money on a Big Mac and on bubble gum.</p> <p>18 Now, if you're working for an organization usually</p> <p>19 the --</p> <p>20 Q. So stop. I understand what you mean.</p> <p>21 A. Hold on a second.</p> <p>22 Q. Let me ask you a question.</p> <p>23 A. So what she did -- what he did --</p> <p>24 Q. How much money -- stop.</p> <p>25 THE COURT REPORTER: I can't get</p>

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<p>1 both of you.</p> <p>2 BY MR. CARSON:</p> <p>3 Q. How much money was granted to Danny --</p> <p>4 who was the money granted to?</p> <p>5 A. The money was granted in the grant</p> <p>6 contract --</p> <p>7 Q. Just a name. Danny Thomas, right?</p> <p>8 A. There's not a name, Mr. Carson.</p> <p>9 Q. Well, who did -- how was the money</p> <p>10 sent?</p> <p>11 A. The money was wired to a --</p> <p>12 Q. Where?</p> <p>13 A. -- to a bank account that Lisa</p> <p>14 Barbounis provided to the Middle East Forum that she</p> <p>15 said came from Danny Thomas.</p> <p>16 Q. Okay. So the money was sent to Danny</p> <p>17 Thomas's bank account, correct?</p> <p>18 A. I don't know if it was Danny Thomas's</p> <p>19 bank account. Ms. Barbounis said it was Danny</p> <p>20 Thomas's bank account. And there was actually</p> <p>21 problems with the initial transfer. We sent the</p> <p>22 money overseas --</p> <p>23 Q. I didn't ask you any questions --</p> <p>24 A. -- and then --</p> <p>25 Q. -- anything about a transfer, I didn't</p>	<p>1 A. You want to know how much. I'm trying</p> <p>2 to give you the exact amount of how much it was.</p> <p>3 Q. Thank you. Was it 25,000? Is that</p> <p>4 your testimony?</p> <p>5 A. No, it's not.</p> <p>6 Q. Approximately 25,000?</p> <p>7 A. It was between twenty -- about 25,000</p> <p>8 pounds, but I don't know the dollar rate.</p> <p>9 Q. I don't care what the dollar rate is.</p> <p>10 A. Okay.</p> <p>11 Q. Okay? It's not important. Okay.</p> <p>12 Thank you.</p> <p>13 A. Okay.</p> <p>14 Q. So 25,000 pounds. The intention was to</p> <p>15 transfer 25,000 pounds to Danny Thomas, correct?</p> <p>16 A. No, that was not the intention. The</p> <p>17 intention was to transfer the money to the -- the</p> <p>18 individual that Lisa Barbounis represented was the</p> <p>19 organizer of the event so that --</p> <p>20 Q. And who was that?</p> <p>21 A. -- so that vendors would be paid.</p> <p>22 Q. Who was that?</p> <p>23 A. It was Danny Thomas.</p> <p>24 Q. So then what are you talking about?</p> <p>25 A. It was Danny Thomas and Kevin Carroll,</p>
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<p>1 ask you any questions about that.</p> <p>2 A. Sure. Sure. I'm trying to answer your</p> <p>3 questions.</p> <p>4 Q. No, you're not, but just -- just listen</p> <p>5 to my questions. Okay? Because we're going to get</p> <p>6 through this.</p> <p>7 So you're saying that the intention was</p> <p>8 for the Middle East Forum to send how much money to</p> <p>9 Danny Thomas?</p> <p>10 A. The exact amount I don't recall, but I</p> <p>11 would say it was probably around 25,000 pounds, which</p> <p>12 I'm not sure of the conversion rate at the time. We</p> <p>13 can look this up in the records. It was probably</p> <p>14 between --</p> <p>15 Q. I don't care about the --</p> <p>16 A. -- 28 and --</p> <p>17 Q. -- conversion rate. Just give me an</p> <p>18 amount.</p> <p>19 A. Mr. Carson, I'm not trying to have a</p> <p>20 conversation; I'm trying to answer a question.</p> <p>21 Q. Is it 25 -- it was an amount. I asked</p> <p>22 you for an amount. 25,000 pounds?</p> <p>23 A. I'm trying to give you an exact amount.</p> <p>24 Q. I don't need an exact amount. I just</p> <p>25 want to know how much. 25,000?</p>	<p>1 it's another acquaintance of Ms. Barbounis, it was --</p> <p>2 Q. Did the money go to two -- Mr. Roman,</p> <p>3 did the money go to two people's accounts or one</p> <p>4 account?</p> <p>5 A. No, the account -- there was actually</p> <p>6 two accounts that were provided.</p> <p>7 Q. Did the money -- was the money sent</p> <p>8 from -- to two accounts, 15 and 15, 20 and 15, or did</p> <p>9 it all go to one account?</p> <p>10 A. I would have to look at the books to be</p> <p>11 able to tell you how many transfers were made, but I</p> <p>12 know that the initial transfer was problematic --</p> <p>13 Q. Who made the -- who made the transfers?</p> <p>14 A. You can ask Marnie Meyer about that.</p> <p>15 Q. Marnie Meyer made those transfers,</p> <p>16 correct?</p> <p>17 A. At the suggestion of Lisa Barbounis,</p> <p>18 correct.</p> <p>19 Q. And you approved those transfers,</p> <p>20 correct?</p> <p>21 A. After Ms. Barbounis represented to me</p> <p>22 that it was going to support the rally that she went</p> <p>23 to.</p> <p>24 Q. Who told her to begin working on the</p> <p>25 Tommy Robinson campaign in the first place?</p>



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<p>1 A. I think that there was a discussion 2 where we saw that this guy -- 3 Q. I'm asking for the name of a person. 4 A. I'm trying to remember. I'm trying to 5 remember, Mr. Carson. 6 Q. Who told her to -- you don't have to 7 talk out loud. Think in your mind -- 8 A. Okay. 9 Q. -- and give us the name of a person. 10 A. Okay. So I'm thinking in my mind right 11 now. 12 Q. Okay. 13 A. And I'm thinking about Tommy Robinson. 14 Q. Who assigned Ms. Barbounis to work on 15 this rally? 16 A. I believe Ms. Barbounis volunteered. 17 Q. So Ms. Barbounis came to you out of 18 nowhere and said Tommy Robinson. 19 A. No, it wasn't out of nowhere. The 20 involvement with Tommy Robinson started years before 21 when we provided legal assistance to the individual 22 when he was found involved with some contempt 23 proceeding or some free speech case. It might have 24 even been before I started working at MEF. 25 Q. After you approved the \$25,000 and</p>	<p>1 think that? 2 A. It's not that I think it; it's that the 3 e-mails, text messages, and all of the communications 4 from Lisa Barbounis that you provided to us in 5 discovery prove that she was the center point for 6 that rally. 7 Q. Well, we're going to find out if that's 8 true; aren't we, Mr. Roman? But why do you -- 9 A. I already have, Mr. Carson. I've 10 looked at the information -- 11 Q. Mr. Roman -- 12 A. -- you've provided to MEF. 13 Q. -- why do you think that? What -- you 14 can't just say that's what the evidence proves. You 15 sound like Donald Trump. Why? What evidence? 16 A. Mr. Carson, I take great exception with 17 you trying to insult me at a deposition. 18 Q. Why, Mr. Roman? What evidence are you 19 talking about? Be specific. What evidence proves 20 that she was intimately involved with managing the 21 rally? 22 A. Sure. So let's start with the text 23 messages. 24 Q. Just give me one piece of evidence. 25 A. E-mails --</p>
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<p>1 Marnie sent it to Danny Thomas, Lisa Barbounis went 2 to London to oversee the rally that was put on with 3 that money; is that correct? 4 A. No, it wasn't \$25,000. 5 Q. Mr. Roman, I'm using the number you 6 gave me. 7 A. I said 25,000 pounds. 8 Q. Right. 25,000 pounds. Good. Is that 9 right then if we said pounds? 10 A. Yeah, but, like I said, I didn't know 11 the dollar amount. 12 Q. Okay. So after Marnie transferred 13 25,000 pounds that you approved Lisa Barbounis went 14 to London to see the rally that was paid for with the 15 Middle East Forum grant; is that correct? 16 A. No. Ms. Barbounis went -- 17 Q. She didn't go there to see the rally? 18 A. No, she didn't go there to see the 19 rally; she went there to manage the rally. 20 Q. To manage the rally? 21 A. Correct. Ms. Barbounis was intimately 22 involved in the planning of all aspects related to 23 the Middle East Forum's backing of that rally that 24 took place in London in June of 2018. 25 Q. Why do you think that? Why do you</p>	<p>1 Q. We don't have to start anywhere. One 2 piece of evidence. 3 A. E-mails that were -- 4 Q. All right. Give me one e-mail and tell 5 me what it said. 6 MR. GOLD: Excuse me, Mr. Carson. 7 I know it's getting late. Just let Mr. 8 Roman finish his answer and then you can 9 ask another question. All right? Go 10 ahead. 11 BY MR. CARSON: 12 Q. One e-mail, what did it say? Tell me 13 one e-mail. Describe it. 14 A. Sure. So -- 15 MR. GOLD: One question at a time, 16 Mr. Carson. 17 BY MR. CARSON: 18 Q. Go ahead. 19 A. Okay. So that was a compound question. 20 One e-mail -- 21 Q. Go ahead. Describe one e-mail. 22 A. Sure. So an e-mail that Danny Thomas 23 -- I think he was dannythomas@tesco.co.uk -- 24 Q. Right. Great. 25 A. -- sent -- excuse me?</p>

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<p>1 Q. Keep going.</p> <p>2 A. Okay. -- sent to Lisa Barbounis</p> <p>3 involved the deployment of buses that were to go from</p> <p>4 the midlands of England, from the Scottish border,</p> <p>5 from Sheffield, from Manchester, I think Wales was</p> <p>6 involved, and they were busing these people in from</p> <p>7 these areas that were outside of London and coming</p> <p>8 into London. Then what happened was --</p> <p>9 Q. I don't need to know what happened. I</p> <p>10 said to describe an e-mail.</p> <p>11 A. I'm giving you the e-mail description.</p> <p>12 Q. Right. Are you still talking about the</p> <p>13 e-mail or are you going to tell me what happened --</p> <p>14 A. Hundred percent I'm talking about the</p> <p>15 e-mail.</p> <p>16 Q. Okay. Go ahead.</p> <p>17 A. And the e-mail that was between Ms.</p> <p>18 Barbounis and Mr. Thomas were talking about the</p> <p>19 intricate difficulties in trying to make sure that</p> <p>20 enough people attend, so what they discussed was that</p> <p>21 there would be additional monies that Mr. Thomas</p> <p>22 suggested that Ms. Barbounis provide to what they</p> <p>23 call the lift carrier, so she's talking about in this</p> <p>24 e-mail the money that -- or not even the money, the</p> <p>25 quotes that the team she was working with in the UK</p>	<p>1 time, correct?</p> <p>2 A. I don't know.</p> <p>3 Q. Isn't it funny that you're accusing her</p> <p>4 of entering into a conspiracy with someone she didn't</p> <p>5 know?</p> <p>6 A. No, Mr. Carson. She engaged in a</p> <p>7 four-month at least intimate affair with Danny</p> <p>8 Thomas, and I think they knew parts of each other</p> <p>9 that no one else probably knew about Danny Thomas or</p> <p>10 Lisa Barbounis. This is the ultimate definition of</p> <p>11 what I would consider to be not just a conspiracy but</p> <p>12 an enterprise designed to defraud the Middle East</p> <p>13 Forum.</p> <p>14 Q. When did you find out that there might</p> <p>15 have been -- strike that.</p> <p>16 Why do you think that Danny Thomas</p> <p>17 didn't spend all the money on the rally?</p> <p>18 A. I don't know. You would have to ask</p> <p>19 Danny Thomas.</p> <p>20 Q. Well, why -- but you're alleging that,</p> <p>21 aren't you, that not all the money went to the rally?</p> <p>22 A. No, I'm not alleging that --</p> <p>23 Q. You just said partial receipts.</p> <p>24 A. I'm not alleging that, Mr. Carson.</p> <p>25 What I'm doing is I'm taking the testimony that</p>
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<p>1 was getting from that team and then going down, but</p> <p>2 in the end I don't think any money was paid directly</p> <p>3 to the bus companies --</p> <p>4 Q. Why would you grant money to Danny</p> <p>5 Thomas if Ms. Barbounis was going to manage the whole</p> <p>6 thing? Why wouldn't you just let her handle it?</p> <p>7 A. Well, I did let her handle it and she</p> <p>8 recommended sending money to Danny Thomas. That's</p> <p>9 where the entire conspiracy began.</p> <p>10 Q. Did she know Danny Thomas at the time?</p> <p>11 A. She recommended him and she said she --</p> <p>12 Q. Did she know Danny Thomas at the time;</p> <p>13 yes or no?</p> <p>14 A. When -- what time are we talking about?</p> <p>15 Q. What time are you talking about?</p> <p>16 A. I'm talking about the time that Lisa</p> <p>17 Barbounis introduced me to Danny Thomas.</p> <p>18 Q. June 2018, right?</p> <p>19 A. Yeah, I can't tell --</p> <p>20 Q. Did she know him at that time; yes or</p> <p>21 no?</p> <p>22 A. I can't -- I can't represent what</p> <p>23 Ms. Barbounis's relationship was with Danny Thomas</p> <p>24 prior to when she introduced me to him.</p> <p>25 Q. Right. She didn't know him at the</p>	<p>1 Danny Thomas in part gave --</p> <p>2 Q. Danny Thomas hasn't testified,</p> <p>3 Mr. Roman.</p> <p>4 A. Okay, so the statement that Mr. Thomas</p> <p>5 made in the presence of two attorneys registered with</p> <p>6 the Pennsylvania Bar just like you are, Mr. Carson,</p> <p>7 and said in a recording. I'm also talking about a</p> <p>8 statement that --</p> <p>9 Q. I don't need you to pull up any</p> <p>10 statements. Seriously. You can put it down.</p> <p>11 A. -- you provided to -- okay. I'm just</p> <p>12 trying to refresh my memory based on the evidence</p> <p>13 that you provided to us.</p> <p>14 Q. Did you hear my question?</p> <p>15 A. Yeah, you're saying -- can the</p> <p>16 stenographer repeat the question, please?</p> <p>17 Q. I'll just say it again. I'm not going</p> <p>18 to make her do that.</p> <p>19 So my question is -- at some point in</p> <p>20 time did you learn that Danny Thomas might not have</p> <p>21 spent the entire \$25,000 on the rally?</p> <p>22 A. Mr. Carson, again --</p> <p>23 Q. Yes or no question.</p> <p>24 A. -- it wasn't \$25,000.</p> <p>25 Q. 25,000 pounds. Thank you for helping</p>

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<p>1 me with that. Thank you.</p> <p>2 A. Sure.</p> <p>3 Q. 25,000 pounds.</p> <p>4 A. What about it?</p> <p>5 Q. At some point in time did you discover</p> <p>6 that maybe he didn't spend it all on the rally?</p> <p>7 A. Yes, I discovered that, Mr. Carson.</p> <p>8 Q. Okay. How did you discover that?</p> <p>9 A. When I believe Ms. Jazmin Bishop</p> <p>10 provided me and the Middle East Forum and our</p> <p>11 attorneys with a record that constituted Ms.</p> <p>12 Barbounis's statements with Mr. Thomas from March</p> <p>13 7th, 2019.</p> <p>14 Q. What are you talking about?</p> <p>15 A. Talking about --</p> <p>16 Q. Talking about text messages?</p> <p>17 A. No, not just the text messages;</p> <p>18 specific quote where Ms. --</p> <p>19 Q. Are you reading from a text message?</p> <p>20 A. No, I'm recollecting my memory from a</p> <p>21 piece of evidence that you gave to us.</p> <p>22 Q. Is it a text message?</p> <p>23 A. It's a text message you gave to us,</p> <p>24 yes.</p> <p>25 Q. Why do you keep saying no then? I'm</p>	<p>1 Q. I don't need a list of the discovery in</p> <p>2 this case. Thank you, though.</p> <p>3 A. There's also a lot of stuff you haven't</p> <p>4 given yet, and I look forward to reading that as</p> <p>5 well.</p> <p>6 Q. Good luck with that.</p> <p>7 Did you ever talk to Danny Thomas</p> <p>8 before?</p> <p>9 A. Yes.</p> <p>10 Q. Did you offer to pay him money for his</p> <p>11 -- for his testimony?</p> <p>12 A. No.</p> <p>13 Q. Why did he say you did?</p> <p>14 A. I don't think you can ask a question</p> <p>15 which is based on a factual predicate on instances</p> <p>16 that did not exist, Mr. Carson.</p> <p>17 Q. Well, why would he say that you offered</p> <p>18 to give him a wink and a nod when this whole thing</p> <p>19 ends?</p> <p>20 A. Mr. Carson, I am not Danny Thomas and I</p> <p>21 can't answer that question.</p> <p>22 Q. So he's lying when he says that, right?</p> <p>23 A. About what, Mr. Carson?</p> <p>24 Q. He's lying when he says you offered to</p> <p>25 pay for his testimony.</p>
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<p>1 asking you if it's a text message.</p> <p>2 A. I didn't say no; I'm saying that it's a</p> <p>3 --</p> <p>4 Q. You understand you're under oath, you</p> <p>5 can't say no when the answer is yes.</p> <p>6 A. Well, Mr. Carson --</p> <p>7 Q. That's called a lie.</p> <p>8 A. Mr. Carson, I'm not lying. What I'm</p> <p>9 saying is --</p> <p>10 Q. Stop perjuring yourself today.</p> <p>11 A. I'm not reading from a text message;</p> <p>12 I'm reading from a printout that came in discovery</p> <p>13 that you gave to us. Now, this might be an e-mail,</p> <p>14 might be a text message --</p> <p>15 Q. You're holding a text message.</p> <p>16 A. This might be an e-mail, it might be a</p> <p>17 text message, and I'm quoting from it.</p> <p>18 Q. Did it come from an electronic</p> <p>19 communication?</p> <p>20 A. It came from something that you</p> <p>21 provided to us in discovery, yes.</p> <p>22 Q. Okay.</p> <p>23 A. But there is all kind of things you</p> <p>24 gave to us. You gave to us WhatsApp, you gave to us</p> <p>25 text messages, you gave to us e-mails.</p>	<p>1 A. Mr. Carson, I don't believe that Danny</p> <p>2 Thomas has ever said that.</p> <p>3 Q. I can play you the recording if you</p> <p>4 want.</p> <p>5 A. I appreciate to hear that, Mr. Carson.</p> <p>6 Q. No problem. I would be happy to.</p> <p>7 A. Sure. Just as a point of information,</p> <p>8 do you have --</p> <p>9 Q. You don't have to say -- there is no</p> <p>10 question pending. No points of information are</p> <p>11 required. Thank you, though.</p> <p>12 A. -- a transcript that goes along with</p> <p>13 the recording.</p> <p>14 Q. I'm sure there is.</p> <p>15 THE COURT REPORTER: Okay. I'm</p> <p>16 going to go off the record for the</p> <p>17 recording.</p> <p>18 MR. CARSON: No, we don't have to</p> <p>19 go off the record. This can be on</p> <p>20 record.</p> <p>21 THE COURT REPORTER: I mean when</p> <p>22 you play it.</p> <p>23 MR. GOLD: You would have no shot</p> <p>24 at stenographically recording this</p> <p>25 thing.</p>

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<p>1 (Audio played.)</p> <p>2 BY MR. CARSON:</p> <p>3 Q. He said I'm fuckin' testifying,</p> <p>4 brother, under oath. I'm taking her to fuckin' town.</p> <p>5 A. Yeah.</p> <p>6 Q. Does that sound like someone who is</p> <p>7 credible?</p> <p>8 A. Yes, a hundred percent, especially</p> <p>9 because if we go back to earlier question --</p> <p>10 Q. You think Daniel Thomas is credible?</p> <p>11 A. Well, in --</p> <p>12 Q. I asked you a yes or no question.</p> <p>13 A. -- in reference --</p> <p>14 Q. I don't need to know --</p> <p>15 A. In reference --</p> <p>16 THE COURT REPORTER: Please one at</p> <p>17 a time.</p> <p>18 BY MR. CARSON:</p> <p>19 Q. Gregg, stop. Seriously. I'm asking</p> <p>20 you yes or no questions. That's it.</p> <p>21 A. No, Mr. Carson.</p> <p>22 MR. GOLD: Hold on. Ask the</p> <p>23 question, let him answer, then you can</p> <p>24 follow with another question.</p> <p>25 BY MR. CARSON:</p>	<p>1 Barbounis I believe he's credible, yes.</p> <p>2 Q. You think he's a credible person,</p> <p>3 period.</p> <p>4 A. I do. I also believe --</p> <p>5 Q. You do.</p> <p>6 A. -- that --</p> <p>7 Q. No, no, I don't need to know what else</p> <p>8 you believe. The question was about Daniel Thomas</p> <p>9 and your feelings on his credibility.</p> <p>10 A. When Mr. Thomas is speaking about Lisa</p> <p>11 Barbounis --</p> <p>12 Q. Mr. Roman, there is no question</p> <p>13 pending. None.</p> <p>14 A. You didn't let me finish because you</p> <p>15 cut me off on the last --</p> <p>16 Q. I asked you a yes or no question.</p> <p>17 There is nothing to finish.</p> <p>18 A. I would like to --</p> <p>19 Q. Do you think he's credible.</p> <p>20 A. -- just put -- I would like to --</p> <p>21 Q. I'm going to play the rest of the</p> <p>22 recording now.</p> <p>23 A. You just said do you think he's</p> <p>24 credible --</p> <p>25 Q. Yeah, and you said I do.</p>
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<p>1 Q. Do you think Daniel Thomas is credible,</p> <p>2 yes or no?</p> <p>3 A. In what terms, Mr. Carson? He's</p> <p>4 probably --</p> <p>5 Q. Do you think he's a liar? You don't</p> <p>6 know what credible means?</p> <p>7 A. Mr. Carson --</p> <p>8 Q. No, no, no, I -- do you know what</p> <p>9 credible means?</p> <p>10 A. Mr. Carson --</p> <p>11 Q. No, no.</p> <p>12 A. -- the answer is much more complicated</p> <p>13 than that.</p> <p>14 Q. Mr. Roman, stop. I'm not asking you to</p> <p>15 give me a complicated response to a definition of a</p> <p>16 word. I can read you the definition of the word</p> <p>17 credible if you would like me to. Do you want -- do</p> <p>18 you need me to do that?</p> <p>19 A. So as many cases show in this, this</p> <p>20 case is much more complicated than just a yes or no</p> <p>21 question affords to.</p> <p>22 Q. Do you think that Daniel Thomas is</p> <p>23 credible, yes or no?</p> <p>24 A. When Danny Thomas is speaking about the</p> <p>25 pain inflicted upon him and what happened with Lisa</p>	<p>1 A. -- then you said -- then you said</p> <p>2 period, then I said --</p> <p>3 (Audio played.)</p> <p>4 THE WITNESS: -- Mr. -- can I</p> <p>5 finish my --</p> <p>6 BY MR. CARSON:</p> <p>7 Q. No.</p> <p>8 A. -- question?</p> <p>9 Q. There is no question pending.</p> <p>10 (Audio played.)</p> <p>11 THE WITNESS: Mr. Gold, can you</p> <p>12 please --</p> <p>13 (Audio played.)</p> <p>14 BY MR. CARSON:</p> <p>15 Q. I'm taking her to fuckin' town, that's</p> <p>16 what he says, right?</p> <p>17 A. Then he says then she ruined my life.</p> <p>18 So, yeah, that's what he said.</p> <p>19 (Audio played.)</p> <p>20 THE WITNESS: Can we stop there</p> <p>21 for a second?</p> <p>22 BY MR. CARSON:</p> <p>23 Q. No.</p> <p>24 A. Okay. I can't comment if you won't let</p> <p>25 me give the piece by piece if I don't see any written</p>



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<p>1 transcript in front of me.</p> <p>2 Q. Mr. Roman, there is no question</p> <p>3 pending. You're just talking for no reason.</p> <p>4 A. And you're playing a tape that I can't</p> <p>5 comment on.</p> <p>6 MR. GOLD: (Indiscernible.)</p> <p>7 THE COURT REPORTER: I can't hear</p> <p>8 you, Mr. Gold.</p> <p>9 MR. GOLD: What is he -- if there</p> <p>10 is no question pending, what is he</p> <p>11 doing?</p> <p>12 MR. CARSON: Is everyone going to</p> <p>13 stop talking so I can play this? Thank</p> <p>14 you.</p> <p>15 (Audio played.)</p> <p>16 BY MR. CARSON:</p> <p>17 Q. He gave me a little wink and said when</p> <p>18 this is all over we'll thank you.</p> <p>19 A. Yeah.</p> <p>20 Q. What did he mean by that?</p> <p>21 A. I don't know, Mr. Carson. I'm not</p> <p>22 Mr. Daniel Thomas. But I can tell you what he may</p> <p>23 mean.</p> <p>24 Q. Did you give him a little wink and tell</p> <p>25 him when this is all over we're going to thank you?</p>	<p>1 MR. GOLD: What are you doing?</p> <p>2 You're talking to yourself now, Carson?</p> <p>3 One question at a time and let him</p> <p>4 answer the question.</p> <p>5 BY MR. CARSON:</p> <p>6 Q. Yes or no?</p> <p>7 A. Can you read back the question?</p> <p>8 Q. Did you ever give him a little wink and</p> <p>9 tell him when this is all over we're going to thank</p> <p>10 you?</p> <p>11 A. Mr. Carson, that's a compound question.</p> <p>12 One question at a time, please.</p> <p>13 Q. No, it's not a compound question. Did</p> <p>14 you do that?</p> <p>15 A. Did you give him a wink, that's one</p> <p>16 question --</p> <p>17 Q. No, I'm not --</p> <p>18 A. -- and then did you do something else.</p> <p>19 Q. I'm asking if you did that, yes or --</p> <p>20 A. Do what?</p> <p>21 Q. -- no? Did you give him a little wink</p> <p>22 and did you tell him when this is all over we're</p> <p>23 going to thank you. That's one question. Did you do</p> <p>24 that?</p> <p>25 A. No, I had him meet a man named Matthew</p>
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<p>1 A. No, Mr. Carson, I never told him that.</p> <p>2 Q. Okay. So he's lying then.</p> <p>3 A. No, he may not be lying. What he may</p> <p>4 be talking about is a man named Matthew Altass,</p> <p>5 A-l-t-a-s-s.</p> <p>6 Q. He said that -- he said I talked to</p> <p>7 Gregg Roman, he gave me a little wink and told me --</p> <p>8 A. Yeah.</p> <p>9 Q. -- when this is all over we're going to</p> <p>10 thank you. Did you --</p> <p>11 A. Exactly.</p> <p>12 Q. -- do that? Did you do that?</p> <p>13 A. No -- Mr. Carson, I'm answering your</p> <p>14 question.</p> <p>15 Q. No. Mr. Roman --</p> <p>16 A. A man --</p> <p>17 Q. -- did you do that? Did you give him a</p> <p>18 little wink and did you tell him when this is all</p> <p>19 over we're going to thank you.</p> <p>20 MR. GOLD: One question at a time.</p> <p>21 One question at a time. And let him</p> <p>22 answer the question.</p> <p>23 BY MR. CARSON:</p> <p>24 Q. You never did that, right? That's your</p> <p>25 testimony.</p>	<p>1 Altass, who is the premier e-discovery expert in the</p> <p>2 United States -- sorry, not in the United States; in</p> <p>3 the United Kingdom --</p> <p>4 Q. Mr. Roman, I don't need to know --</p> <p>5 A. Mr. Carson --</p> <p>6 MR. GOLD: Let him finish his</p> <p>7 answer.</p> <p>8 BY MR. CARSON:</p> <p>9 Q. Go ahead.</p> <p>10 A. -- in order to assure the chain of</p> <p>11 custody of Mr. Thomas's two electronic devices of</p> <p>12 which a picture should have been provided to you in</p> <p>13 discovery -- if they weren't, I'm asking Mr. Cavalier</p> <p>14 to please give that to him -- so that the purity of</p> <p>15 his testimony and the purity of his evidence wouldn't</p> <p>16 be questioned such a way as doing right now.</p> <p>17 Immediately after Mr. Thomas agreed to testify at the</p> <p>18 U.S. Embassy in London the following happened, which</p> <p>19 I think was an example of Lisa Barbounis taking part</p> <p>20 in witness tampering --</p> <p>21 Q. I don't want to hear about your</p> <p>22 speculation about my client.</p> <p>23 A. It's not speculation, Mr. Carson. I</p> <p>24 have sources that I'm willing to share with you right</p> <p>25 now. Would you like to hear that?</p>

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<p>1 Q. I'm not interested.</p> <p>2 A. Okay.</p> <p>3 Q. Really not. Thank you, though.</p> <p>4 A. Okay. Well, then I can't --</p> <p>5 Q. When is the last --</p> <p>6 A. -- give you a complete answer on why I</p> <p>7 think that --</p> <p>8 Q. You --</p> <p>9 A. -- his --</p> <p>10 Q. Through your lawyers you can make</p> <p>11 whatever arguments you want. I'm not doing that with</p> <p>12 you right now.</p> <p>13 A. It's not an argument, Mr. Carson. It's</p> <p>14 my belief on what he meant when he --</p> <p>15 Q. Mr. Roman, you got to stop.</p> <p>16 A. -- said what you represented he said.</p> <p>17 Q. You got to stop. Seriously.</p> <p>18 MR. GOLD: Mr. Carson, you're not</p> <p>19 -- he's trying to complete his answer --</p> <p>20 MR. CARSON: There's no --</p> <p>21 MR. GOLD: -- you don't like --</p> <p>22 MR. CARSON: There's no question</p> <p>23 pending.</p> <p>24 MR. GOLD: -- the response, you're</p> <p>25 trying to cut him off. Let him just</p>	<p>1 Roman?</p> <p>2 THE WITNESS: No, I'm not,</p> <p>3 Mr. Gold.</p> <p>4 MR. CARSON: Yeah, you are.</p> <p>5 MR. GOLD: Finish your answer</p> <p>6 then, Mr. Roman.</p> <p>7 MR. CARSON: It was a yes or no</p> <p>8 question and you answered it.</p> <p>9 BY MR. CARSON:</p> <p>10 Q. When is the last time -- when is the</p> <p>11 last time you spoke to Daniel Thomas?</p> <p>12 MR. GOLD: Mr. -- let him answer</p> <p>13 the previous question and then he'll</p> <p>14 give you the answer to that question.</p> <p>15 Go ahead.</p> <p>16 MR. CARSON: There is no question</p> <p>17 pending.</p> <p>18 MR. GOLD: There is a question</p> <p>19 pending because there's an answer</p> <p>20 pending. The answer is pending -- yeah,</p> <p>21 there's no question, it's the answer</p> <p>22 that's pending.</p> <p>23 MR. CARSON: There is no answer</p> <p>24 pending.</p> <p>25 MR. GOLD: Let him finish his</p>
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<p>1 finish his answer --</p> <p>2 MR. CARSON: There's absolutely no</p> <p>3 question pending right now.</p> <p>4 MR. GOLD: He's finishing his</p> <p>5 answer --</p> <p>6 MR. CARSON: No, he's not.</p> <p>7 MR. GOLD: -- to your last</p> <p>8 question.</p> <p>9 BY MR. CARSON:</p> <p>10 Q. You can answer this question. When is</p> <p>11 the last time you spoke to Daniel Thomas?</p> <p>12 MR. GOLD: We're going to let</p> <p>13 Mr. Roman finish the answer and then you</p> <p>14 can ask your next question.</p> <p>15 MR. CARSON: Answer to what</p> <p>16 question?</p> <p>17 MR. GOLD: The question about a</p> <p>18 wink of the eye, whatever you're going</p> <p>19 after --</p> <p>20 MR. CARSON: He already answered</p> <p>21 that question.</p> <p>22 MR. GOLD: He's not done answering</p> <p>23 the question.</p> <p>24 MR. CARSON: He is.</p> <p>25 MR. GOLD: Are you done, Mr.</p>	<p>1 answer. Go ahead. Go ahead, Mr. Roman.</p> <p>2 THE WITNESS: Can the stenographer</p> <p>3 please read back the question?</p> <p>4 MR. CARSON: No, she's not going</p> <p>5 to read back the question. She's not</p> <p>6 doing that. You're not doing that to</p> <p>7 the stenographer right now.</p> <p>8 MR. GOLD: I think you were at the</p> <p>9 part of talking about this electronic</p> <p>10 e-discovery expert in the UK, that's</p> <p>11 where you were.</p> <p>12 THE WITNESS: Okay. So --</p> <p>13 BY MR. CARSON:</p> <p>14 Q. Just do what you got to do.</p> <p>15 A. Okay. So you're talking about this</p> <p>16 wink and whatever. Okay? So what we did was --</p> <p>17 Q. All I asked you was did you do it.</p> <p>18 A. No, Mr. Carson, I'm trying to finish my</p> <p>19 answer.</p> <p>20 MR. GOLD: Mr. Carson, take the</p> <p>21 food out of your mouth if you're going</p> <p>22 to ask a question.</p> <p>23 Go ahead, Mr. Roman.</p> <p>24 THE WITNESS: Okay. So when</p> <p>25 Mr. Thomas was engaged in conversations</p>

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<p>1 with Tommy Robinson -- when Daniel 2 Thomas was engaged in conversations with 3 Tommy Robinson, I believe that's when 4 you were able to actually get that 5 recording, he received five phone calls 6 from an associate of his named Si, S-i. 7 In August when Danny Tommy was present 8 these calls all came from an American 9 phone number. They called Si and Danny 10 Tommo got the phone call. Then he 11 started receiving calls from a Qatari 12 registered number and a visit from the 13 UK counterterrorism police in September 14 of 2020. This was all around the time 15 that a man named Darren Perry, a former 16 British serviceman who had been with 17 Tommy Robinson in the English Defence 18 League and was close to his crew, 19 started being around a drug deal that 20 went wrong where because of Mr. Thomas 21 Perry lost a huge amount of money. As a 22 result, the same threats that were made 23 against Mr. Jordan James, another woman 24 named Ashley, and so on, ended up being 25 the same things that happened to</p>	<p>1 Roman. I said did you -- did you do that. 2 A. So when Mr. -- 3 Q. So why are you telling me about drug 4 deals? What the hell are you doing? 5 A. I'm trying -- I'm trying to give the 6 answer, Mr. Carson. 7 Q. No. No, no, no, no. I'm putting a 8 stop -- 9 A. So -- 10 Q. -- to this right now. I'm putting a -- 11 A. Hold on. 12 Q. -- stop to it. We're not going to do 13 this. You're done. You're done that answer. 14 A. I'm done -- I'm done what? I'm not 15 done the answer, Mr. Carson. 16 Q. Yeah, you are. 17 A. I'll finish with one sentence. Is that 18 fair? 19 Q. No. 20 A. Okay. 21 Q. I'm going to ask you the next question 22 now. The next question is -- 23 A. Sure. 24 Q. -- when is the last time you spoke to 25 Daniel Thomas?</p>
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<p>1 Mr. Thomas. The people who were 2 involved with the threats against him 3 include Steven Clark, Gary Paige, Andy 4 Harrison -- 5 BY MR. CARSON: 6 Q. What question -- 7 A. -- Nick Walsh -- 8 Q. -- are you answering right now? What 9 are you telling me? 10 A. -- Jamie McClintock. 11 Q. What are you telling me? 12 A. So when Mr. -- when Mr. Thomas -- 13 Q. What question are you answering right 14 now? What -- I don't even know what you're telling 15 me. 16 A. The wink -- 17 Q. You're just blabbing. 18 A. The wink -- the wink question, Mr. 19 Carson. 20 Q. The question was did you say that. 21 A. So -- 22 THE COURT REPORTER: One at a 23 time. 24 BY MR. CARSON: 25 Q. That was the question I asked you, Mr.</p>	<p>1 MR. GOLD: What's the next 2 question? 3 BY MR. CARSON: 4 Q. When is the last time you spoke to 5 Daniel Thomas? 6 A. The last time I spoke with Daniel 7 Thomas was after Lisa Barbounis engineered the 8 quieting of the witness by Tommy Robinson. 9 Q. When is the last time you spoke to 10 Jazmin Bishop? 11 A. Last time I spoke with Jazmin Bishop 12 was after Lisa Barbounis engineered the quieting of 13 her as a witness. 14 Q. When is the last time, I'm sorry? 15 A. After Lisa Barbounis threatened to kill 16 Jazmin Bishop and after she arranged the quieting of 17 the witness through Tommy Robinson. 18 Q. Have you ever asked for that money 19 back? How much -- 20 A. Yes, Mr. Carson. 21 Q. -- money do you -- how much money do 22 you think was stolen by Daniel Thomas? 23 A. I believe that -- if you look at the 24 contract that was signed -- 25 Q. I just need an amount. How much?</p>

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<p>1 A. -- between -- the entirety of the money</p> <p>2 was defrauded from MEF so we will be demanding in a</p> <p>3 future legal action the full amount of money -- and</p> <p>4 actually it was actually conveyed from him.</p> <p>5 Q. How much?</p> <p>6 A. If you read -- if you read --</p> <p>7 Q. How much money?</p> <p>8 A. -- the complaint --</p> <p>9 Q. That's the question. How much?</p> <p>10 A. Probably --</p> <p>11 THE COURT REPORTER: I can't take</p> <p>12 both of you at the same time. Please</p> <p>13 one at a time.</p> <p>14 BY MR. CARSON:</p> <p>15 Q. Stop. I'm asking you a question. How</p> <p>16 much money?</p> <p>17 A. Mr. Carson, if you'll just --</p> <p>18 Q. How much money are we talking about?</p> <p>19 A. If you would let me finish my answer,</p> <p>20 please.</p> <p>21 MR. GOLD: Lower the decibel here</p> <p>22 -- I mean, you're like -- my -- there's</p> <p>23 no need to scream. We're really --</p> <p>24 BY MR. CARSON:</p> <p>25 Q. How much money are we talking about?</p>	<p>1 a result of him --</p> <p>2 Q. Mr. --</p> <p>3 A. -- defrauding us.</p> <p>4 Q. Mr. Roman, I didn't ask you how much</p> <p>5 money you're trying to recover from my client in</p> <p>6 litigation. I said how much money --</p> <p>7 A. I'm not talking about your client; I'm</p> <p>8 talking about Daniel Thomas.</p> <p>9 Q. Can I please finish the question?</p> <p>10 A. Sure.</p> <p>11 Q. How much money are you alleging was</p> <p>12 stolen from the Middle East Forum?</p> <p>13 A. From who?</p> <p>14 Q. Are you alleging that money was stolen</p> <p>15 by the -- from the Middle East Forum?</p> <p>16 A. I'm alleging --</p> <p>17 Q. Yes or no? Are you alleging -- in the</p> <p>18 case -- in a counterclaim against Lisa Barbounis that</p> <p>19 -- it's based on money that was stolen from the</p> <p>20 Middle East Forum, yes or no?</p> <p>21 A. Mr. Carson, I am alleging -- actually</p> <p>22 it's not me, it's the organization that's alleging,</p> <p>23 that Ms. Barbounis both facilitated, she covered up,</p> <p>24 she defrauded, and then breached her duty of loyalty</p> <p>25 to the organization, because as I say what she quotes</p>
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<p>1 A. Mr. Carson, it would be --</p> <p>2 MR. GOLD: Hold on, Mr. Roman.</p> <p>3 Please slow it down. The stenographer</p> <p>4 is not going to -- the record is going</p> <p>5 to be lousy.</p> <p>6 THE COURT REPORTER: The record is</p> <p>7 going to be a mess. The record is going</p> <p>8 to be a mess.</p> <p>9 BY MR. CARSON:</p> <p>10 Q. How much money are we talking about?</p> <p>11 How much money --</p> <p>12 A. Can I answer --</p> <p>13 MR. CARSON: Please type my -- I</p> <p>14 want every time I ask this question to</p> <p>15 be on the record.</p> <p>16 BY MR. CARSON:</p> <p>17 Q. How much money are we talking about?</p> <p>18 A. So, like I said before --</p> <p>19 MR. GOLD: Well, you've</p> <p>20 interrupted him four times already, so</p> <p>21 go ahead.</p> <p>22 BY MR. CARSON:</p> <p>23 Q. How much money are we talking about?</p> <p>24 A. It would be 25,000 pounds plus interest</p> <p>25 plus whatever punitive damages that we would have as</p>	<p>1 on Thursday, March 7th, 2018, she says "and now I</p> <p>2 have proof about the money." She says you are a liar</p> <p>3 and a thief.</p> <p>4 Q. How much money are we talking about?</p> <p>5 A. She says you will never change because</p> <p>6 you are a horrible human.</p> <p>7 Q. How much money are we talking about?</p> <p>8 A. Tens of thousands of pounds --</p> <p>9 Q. How much exactly --</p> <p>10 A. -- that would be --</p> <p>11 Q. -- was taken?</p> <p>12 A. Exactly -- like I said beforehand in</p> <p>13 the original answer, 25,000 pounds --</p> <p>14 Q. Okay. Thank you.</p> <p>15 A. -- plus interest --</p> <p>16 Q. I'm going to ask another question now.</p> <p>17 Thank you.</p> <p>18 A. I can't -- I want to finish --</p> <p>19 Q. 25,000 pounds.</p> <p>20 A. -- the answer, Mr. Carson.</p> <p>21 Q. Can you give me a breakdown of why --</p> <p>22 MR. GOLD: What's the next</p> <p>23 question?</p> <p>24 BY MR. CARSON:</p> <p>25 Q. Why is it 25,000 pounds? Give me --</p>



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<p>1 how much?</p> <p>2 A. As I said beforehand, the approximate</p> <p>3 amount would be the amount of money that we granted</p> <p>4 to the individuals who organized the Tommy Robinson</p> <p>5 rally in June of 2018 plus interest --</p> <p>6 Q. All that money was stolen.</p> <p>7 A. Yes, as a result of breach of contract,</p> <p>8 we have a duty that's in that contract, you can</p> <p>9 review the contract -- it's an exhibit that's part of</p> <p>10 the counterclaim, that allows us to collect not just</p> <p>11 the money that was granted but also any damages that</p> <p>12 came as a result of our organization being defrauded</p> <p>13 by Lisa Barbounis and Daniel Thomas.</p> <p>14 Q. How much money exactly did they -- do</p> <p>15 you allege was used that didn't go toward putting on</p> <p>16 the rally?</p> <p>17 A. Well, Mr. Carson, I believe that there</p> <p>18 is an accounting of that that came --</p> <p>19 Q. So how much is it?</p> <p>20 A. I would say at least, if you look at</p> <p>21 the contractual language, all of the money was</p> <p>22 misappropriated, and as soon as one pound is</p> <p>23 misappropriated, all the money is misappropriated</p> <p>24 according to the terms of the contract. It's very</p> <p>25 clear. It's very clear.</p>	<p>1 Bishop --</p> <p>2 Q. Daniel Thomas is a witness in this</p> <p>3 case?</p> <p>4 A. He may be. I think we may have put him</p> <p>5 on the list of the initial Rule 26 disclosures. If</p> <p>6 he's not there, he should be amended.</p> <p>7 Q. You're going to fly him to the United</p> <p>8 States?</p> <p>9 THE COURT REPORTER: What was</p> <p>10 that?</p> <p>11 THE WITNESS: I will do --</p> <p>12 THE COURT REPORTER: What was</p> <p>13 that?</p> <p>14 THE WITNESS: -- whatever is</p> <p>15 necessary to make sure -- you know, so</p> <p>16 -- we got coronavirus we got to worry</p> <p>17 about, we have to worry about maybe the</p> <p>18 guy's going to be --</p> <p>19 BY MR. CARSON:</p> <p>20 Q. I asked if you were going to fly him to</p> <p>21 the United States. It's a yes or no question. I</p> <p>22 don't need to hear about coronavirus.</p> <p>23 A. I don't know. You know, there may be</p> <p>24 the ability for us to conduct --</p> <p>25 MR. GOLD: We'll check with his</p>
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<p>1 Q. And you're alleging that Ms. Barbounis</p> <p>2 was involved in Daniel Thomas not spending all the</p> <p>3 money on the -- allegedly not spending all the money</p> <p>4 on the rally?</p> <p>5 A. As soon as she became aware of the</p> <p>6 fraud she had a duty to the organization to report</p> <p>7 it. As soon as she stopped and thought about it and</p> <p>8 said it in multiple messages to other people, she</p> <p>9 became part of the conspiracy. When she became part</p> <p>10 of the conspiracy of fraudulent -- aiding and</p> <p>11 abetting the fraudulent misrepresentation of funds</p> <p>12 which were granted to Danny Thomas, she breached her</p> <p>13 duty of loyalty to the organization, and that's why</p> <p>14 those three claims have been filed against Ms.</p> <p>15 Barbounis.</p> <p>16 Q. Can you prove any money was stolen?</p> <p>17 A. Yes.</p> <p>18 Q. How?</p> <p>19 A. Based on the testimony of at least four</p> <p>20 people involved and the text messages of</p> <p>21 Ms. Barbounis and of Ms. McNulty and of Ms. Marnie</p> <p>22 Meyer. I have seven witnesses who will show that</p> <p>23 that money was stolen.</p> <p>24 Q. Well, name one of them.</p> <p>25 A. I just did. Daniel Thomas, Kalina [ph]</p>	<p>1 travel agent.</p> <p>2 THE WITNESS: Yeah. Well, not</p> <p>3 just that --</p> <p>4 MR. CARSON: Thank you.</p> <p>5 THE WITNESS: -- some judges now</p> <p>6 are allowing for --</p> <p>7 MR. CARSON: I heard your</p> <p>8 attorney's answer. Thank you.</p> <p>9 THE WITNESS: Okay.</p> <p>10 BY MR. CARSON:</p> <p>11 Q. So Daniel Thomas told you that he stole</p> <p>12 money?</p> <p>13 A. Yes.</p> <p>14 Q. Did you ask for it back?</p> <p>15 A. Yes.</p> <p>16 Q. From Daniel Thomas.</p> <p>17 A. I did.</p> <p>18 Q. In writing?</p> <p>19 A. I think I did verbally and I also said</p> <p>20 that we are considering pursuing litigation against</p> <p>21 Mr. Thomas both in the United States and in the</p> <p>22 United Kingdom. We --</p> <p>23 Q. Have you done anything? Have you</p> <p>24 started any litigation against Daniel Thomas?</p> <p>25 A. Yes, there is two pending lawsuits that</p>

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<p>1 we're about to file. The first is being filed by 2 Sidkoff, Pincus &amp; Green. The attorney is Robert 3 Davitch.</p> <p>4 Q. I asked you a yes or no question. Have 5 you started any litigation against Daniel Thomas as 6 of today. It's 11/20/2020. Can I go into a docket 7 somewhere and see a case that you filed against him, 8 yes or no?</p> <p>9 A. No, well -- Mr. Carson, as you know --</p> <p>10 Q. So you haven't --</p> <p>11 A. -- the process --</p> <p>12 Q. -- started litigation against Daniel 13 Thomas today.</p> <p>14 A. -- the process of starting 15 litigation --</p> <p>16 Q. So stop lying, Mr. Roman.</p> <p>17 MR. GOLD: Hold on.</p> <p>18 BY MR. CARSON:</p> <p>19 Q. Stop saying yes when the answer is no.</p> <p>20 MR. GOLD: Mr. Carson, the word 21 started means retaining a lawyer --</p> <p>22 MR. CARSON: No, it doesn't. Mr. 23 Gold -- no, it doesn't.</p> <p>24 MR. GOLD: (Indiscernible.)</p> <p>25 MR. CARSON: Have you initiated</p>	<p>1 ability to take a barrister or a solicitor to start 2 pre-discovery before the filing of a lawsuit. The 3 Middle East Forum has attained a lawyer in the United 4 Kingdom -- first we attained the firm Mishcon de 5 Reya, which was in March of 2020, and they were to 6 interview Jazmin Bishop before Ms. Bishop was 7 intimidated into no longer testifying and then --</p> <p>8 THE WITNESS: Mr. Gold, do you 9 know the name of the firm -- or 10 Mr. Rieser, do you know the --</p> <p>11 BY MR. CARSON:</p> <p>12 Q. You can't ask your lawyers questions in 13 the middle of a deposition.</p> <p>14 A. Okay. Sorry. So there is a firm whose 15 name I don't specifically remember right now but I 16 know that there has been this whole mess over a 17 passport photo, but there is a firm in the UK that's 18 already been on Daniel Thomas for at least two months 19 and they are working in conjunction with Sidkoff 20 Pinus &amp; Green to file a RICO case against your 21 client, Ms. Lisa Barbounis, and I expect that 22 complaint to either be given to you as a way in which 23 to start settlement negotiations or to be filed in 24 the Eastern District in the coming weeks.</p> <p>25 Q. Never have to give that to me to begin</p>
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<p>1 any litigation I said.</p> <p>2 THE COURT REPORTER: Excuse me. 3 Excuse me. I can't hear Mr. Gold. I 4 couldn't hear any of that conversation. 5 Everybody is talking all over each 6 other.</p> <p>7 BY MR. CARSON:</p> <p>8 Q. Have you initiated any litigation. The 9 answer is no, correct?</p> <p>10 A. No, that's incorrect. I have initiated 11 litigation.</p> <p>12 Q. So there is a courthouse -- what court 13 have you filed a case in?</p> <p>14 A. So in the United Kingdom --</p> <p>15 Q. What court have you filed a case in? 16 Just give me the name of the court.</p> <p>17 A. Mr. Carson, I'm still answering the 18 last question.</p> <p>19 Q. No, you're not. What court have you 20 filed a case in?</p> <p>21 A. Mr. Carson, if you're familiar with the 22 way in which common law works in the United 23 Kingdom --</p> <p>24 Q. Can you give me the name of the court?</p> <p>25 A. -- there is the ability -- there is the</p>	<p>1 settlement negotiations.</p> <p>2 A. Well, I'm just saying, I don't know how 3 it works, but a letter was sent to you on September 4 28th --</p> <p>5 Q. Okay. All right. There is no --</p> <p>6 A. -- and --</p> <p>7 Q. Mr. Roman, there is no question pending 8 right now. We're not having a conversation with each 9 other.</p> <p>10 MR. GOLD: Next question.</p> <p>11 THE WITNESS: I'm just answering 12 your last question.</p> <p>13 MR. GOLD: Next question.</p> <p>14 BY MR. CARSON:</p> <p>15 Q. Is there any other basis for the 16 counterclaim other than what you've already testified 17 to?</p> <p>18 A. Yes, there is at least 12 charges we're 19 considering.</p> <p>20 Q. I'm -- Mr. Roman, I'm not asking you 21 about things that aren't in the counterclaim that are 22 bouncing around in your brain.</p> <p>23 A. Not 12 legal charges.</p> <p>24 Q. I'm asking you about what is in the 25 counterclaim that you filed. Do you understand the</p>

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<p>1 difference?</p> <p>2 MR. GOLD: Mr. Carson, you're</p> <p>3 getting abusive now. If it's getting</p> <p>4 late for you, take a break and, you</p> <p>5 know, get a cup of coffee, but --</p> <p>6 MR. CARSON: No, Mr. Gold, why</p> <p>7 don't you take a break and have a</p> <p>8 conversation with your client.</p> <p>9 MR. GOLD: You know what, why</p> <p>10 don't we just take a five-minute break.</p> <p>11 We have a -- we're trying to get to the</p> <p>12 end of this thing. I just don't want</p> <p>13 the record to be so replete with people</p> <p>14 jumping in and out. I respect the</p> <p>15 stenographer. And I want the record to</p> <p>16 be clean. So let's take a five-minute</p> <p>17 break, everybody take a deep breath, and</p> <p>18 come back and --</p> <p>19 MR. CARSON: I want him to answer</p> <p>20 the question that's pending. He has to</p> <p>21 answer the question --</p> <p>22 MR. GOLD: What's the question?</p> <p>23 BY MR. CARSON:</p> <p>24 Q. The question that's pending, is there</p> <p>25 anything else that is in litigation now that the</p>	<p>1 the basis of the counterclaim?</p> <p>2 MR. CAVALIER: Same objection.</p> <p>3 BY MR. CARSON:</p> <p>4 Q. The factual basis is what I'm talking</p> <p>5 about.</p> <p>6 A. Sure. So we can start --</p> <p>7 MR. CAVALIER: Same objection.</p> <p>8 THE WITNESS: -- in June of</p> <p>9 2018 --</p> <p>10 BY MR. CARSON:</p> <p>11 Q. Do you understand what the basis means?</p> <p>12 A. Yeah, yeah, I'm giving you the evidence</p> <p>13 which --</p> <p>14 Q. Let me help you. Let me help.</p> <p>15 MR. GOLD: Mr. Carson -- you're</p> <p>16 getting abusive again, Mr. Carson.</p> <p>17 BY MR. CARSON:</p> <p>18 Q. I'm going to help. The basis of the</p> <p>19 counterclaim begin -- so you're alleging that Lisa</p> <p>20 Barbounis and Daniel Thomas --</p> <p>21 MR. GOLD: (Indiscernible.)</p> <p>22 MR. CARSON: Why are you</p> <p>23 interrupting me?</p> <p>24 THE COURT REPORTER: I can't hear</p> <p>25 you, Mr. Gold.</p>
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<p>1 counterclaims are based on other than what you've</p> <p>2 already testified to?</p> <p>3 MR. CAVALIER: Object to form.</p> <p>4 You can answer.</p> <p>5 THE WITNESS: Okay. So there's</p> <p>6 Exhibit A to Exhibit HH which is replete</p> <p>7 with dozens of accusations that -- or</p> <p>8 dozens of pieces of evidence that back</p> <p>9 the three charges --</p> <p>10 BY MR. CARSON:</p> <p>11 Q. I want to know what -- I want to know</p> <p>12 what the basis of the counterclaim is other than what</p> <p>13 you've already testified to.</p> <p>14 A. We'll have to go through each exhibit</p> <p>15 and I can give you the relevance to each part if you</p> <p>16 would like to do that.</p> <p>17 Q. We're not going to take a break and let</p> <p>18 your lawyers tell you and then come back and tell me.</p> <p>19 A. You don't have to. I don't have to</p> <p>20 take a break, Mr. Carson. I can go exhibit by</p> <p>21 exhibit right now without taking a break. Let's do</p> <p>22 it.</p> <p>23 Q. No. I want to know from you what the</p> <p>24 basis of the counterclaim is. I'm not going to show</p> <p>25 you the complaint so you can read it to me. What is</p>	<p>1 MR. GOLD: Mr. Carson, there is a</p> <p>2 counterclaim filed right now against</p> <p>3 your client.</p> <p>4 MR. CARSON: Yeah, there is.</p> <p>5 MR. GOLD: You know what the basis</p> <p>6 of it is. Just read it.</p> <p>7 MR. CARSON: No. I'm asking your</p> <p>8 client about it.</p> <p>9 MR. GOLD: Okay. He'll tell you</p> <p>10 what the basis of it is if that's what</p> <p>11 you want --</p> <p>12 MR. CARSON: All right.</p> <p>13 BY MR. CARSON:</p> <p>14 Q. So the --</p> <p>15 MR. CARSON: Stop interrupting,</p> <p>16 please.</p> <p>17 BY MR. CARSON:</p> <p>18 Q. The basis that you've already testified</p> <p>19 to is money that was stolen with regard to this</p> <p>20 25,000 dollar -- pound grant. So what -- besides</p> <p>21 that grant, what else is the basis of your</p> <p>22 counterclaim?</p> <p>23 MR. CAVALIER: Object to form.</p> <p>24 You can answer.</p> <p>25 THE WITNESS: So we start in June</p>

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<p>1 of 2018. Ms. Barbounis gives the 2 representation that Daniel Thomas is a 3 reliable agent from which we can use to 4 facilitate a rally in the United 5 Kingdom. 6 BY MR. CARSON: 7 Q. That's the one I just said. 8 A. Huh? 9 Q. This is the one I just said, the 25,000 10 pound. 11 A. I'm getting there. You asked me what 12 the basis -- 13 Q. I'm asking what the other ones are. 14 A. Well, Mr. Carson, it starts -- 15 MR. GOLD: Mr. Carson, let him 16 finish the answer. 17 MR. RIESER: Seth, I think the 18 court reporter really needs a break. 19 MR. CARSON: I said other than 20 what we've already testified to. 21 THE COURT REPORTER: I can't hear 22 anybody. I can't hear anybody. 23 MR. RIESER: Seth, the court 24 reporter really needs a break. 25 MR. CARSON: Well, he's going to</p>	<p>1 A. Well, you're asking me about the 2 diagram. 3 Q. No, I didn't. I said explain it. 4 What's the first thing you would show me? 5 A. Well, to explain it I have to look at 6 it. 7 Q. No. Mr. Roman, I'm asking you a 8 question. You're refusing to answer it. 9 A. I'm not refusing. I'm trying -- 10 Q. Then tell me what the basis is. 11 MR. GOLD: Mr. Carson -- 12 BY MR. CARSON: 13 Q. What is the basis of the counterclaim? 14 THE COURT REPORTER: Excuse me. 15 Every time -- I can see Mr. Gold is 16 trying to say something. I can't hear 17 anything when you're saying something. 18 It's just not coming through. 19 BY MR. CARSON: 20 Q. What's the basis for the counterclaim? 21 MR. GOLD: Mr. Carson, please stop 22 -- 23 BY MR. CARSON: 24 Q. Stop going on your computer and pulling 25 up a diagram.</p>
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<p>1 answer this question first. 2 MR. CAVALIER: You realize the 3 question is so incredibly broad that you 4 got to give him leeway to answer. 5 MR. CARSON: No, I don't. I said 6 other than -- other than the 25,000, 7 other than him -- other than the 8 relationship with Daniel Thomas, what 9 else. Is there anything else. 10 THE WITNESS: Yes. 11 BY MR. CARSON: 12 Q. What? 13 A. Would it be -- would it help you if I 14 showed you a diagram. 15 Q. No, it would help me if you just were 16 specific and testify to that. 17 A. The diagram has all the specificity 18 that might provide -- 19 Q. Just tell me. 20 A. -- the answers that you're looking for. 21 Q. Can you -- explain the diagram. What's 22 the first thing you would show me? 23 A. Okay. So give me a second. I'll get 24 the diagram. 25 Q. No.</p>	<p>1 MR. GOLD: Mr. Carson, stop 2 interfering with the witness's -- 3 MR. CARSON: He can't go on his 4 computer and read an answer from his 5 computer screen, which is exactly what 6 he's doing right now. 7 MR. GOLD: You already made that 8 clear. He's not going into the 9 computer, he's not -- 10 MR. CARSON: That's exactly what 11 he's doing right now. 12 THE WITNESS: That's not what I'm 13 doing, Mr. Carson. 14 BY MR. CARSON: 15 Q. All right. So then tell me what -- 16 why is this so difficult? Just tell me the basis of 17 the counterclaim. 18 THE COURT REPORTER: I can't hear 19 you. 20 BY MR. CARSON: 21 Q. Why is this so difficult? What's the 22 basis for the counterclaim? 23 MR. CAVALIER: Object to form. 24 BY MR. CARSON: 25 Q. What we're talking about is other --</p>



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<p>1 other than what we've already testified to.</p> <p>2 A. This is like Abbott and Costello Who's</p> <p>3 On First.</p> <p>4 MR. CAVALIER: It's also not his</p> <p>5 counterclaim.</p> <p>6 THE WITNESS: Yeah, so -- no, but</p> <p>7 I can answer, Mr. --</p> <p>8 BY MR. CARSON:</p> <p>9 Q. You're the quarterback of it.</p> <p>10 THE WITNESS: -- Cavalier.</p> <p>11 Mr. Carson, I am not the</p> <p>12 quarterback of anything.</p> <p>13 BY MR. CARSON:</p> <p>14 Q. Just answer the question.</p> <p>15 A. Okay. So starting in June of 2018 you</p> <p>16 know about -- you know about --</p> <p>17 Q. Now you're going to -- you're going to</p> <p>18 talk about the \$25,000?</p> <p>19 A. No, you know about the grant already.</p> <p>20 Q. Right. Thank you.</p> <p>21 A. Okay? And how Ms. Barbounis defrauded</p> <p>22 the organization by covering it up.</p> <p>23 Q. Right, I understand --</p> <p>24 A. Breach of contract, all of that. Then</p> <p>25 there was another action that Ms. Barbounis started</p>	<p>1 Q. How did the money get funneled from</p> <p>2 Raheem Kassam --</p> <p>3 A. So if you --</p> <p>4 Q. -- back to --</p> <p>5 A. -- look at the -- if you look at the</p> <p>6 text messages and the PayPal transfers between</p> <p>7 Raheem, Lisa, Tricia, and Vasili -- and we would have</p> <p>8 to go to the -- I have it ready if you want to see</p> <p>9 it.</p> <p>10 Q. No, no. I want you to testify about</p> <p>11 it.</p> <p>12 A. Okay. Well, I'm testifying about what</p> <p>13 I've seen. So there's the --</p> <p>14 Q. That's right.</p> <p>15 A. -- there's the text messages between</p> <p>16 Raheem, Lisa, and Tricia, and then Lisa says, hey,</p> <p>17 Raheem, I'm going to get you that money, and at the</p> <p>18 same time she's telling me that Raheem is not willing</p> <p>19 to help host the event if he's not paid. So she's</p> <p>20 saying to me representing Raheem needs the money to</p> <p>21 be able to do the event. She's saying to Raheem,</p> <p>22 hey, take that money, make sure that my husband gets</p> <p>23 paid, it's going to help me pay to go over there.</p> <p>24 And the whole reason why -- and this is even based on</p> <p>25 Tricia's conversations with Lisa, Raheem Kassam was</p>
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<p>1 right at the outset, too, and that was when she</p> <p>2 misappropriated \$5,000 which was granted to Raheem</p> <p>3 Kassam, then a fellow of the Middle East Forum, and</p> <p>4 directed the money to be paid from MEF to Kassam to</p> <p>5 her husband to cover her flights to the United</p> <p>6 Kingdom when the written agreement that she had with</p> <p>7 MEF that it would only be \$300.</p> <p>8 Q. What flights to the United Kingdom?</p> <p>9 A. The flights that she took to fly to</p> <p>10 London.</p> <p>11 Q. When? When did she fly to London with</p> <p>12 this money?</p> <p>13 A. For the rally we're talking about, June</p> <p>14 of 2018, the one that you asked me about beforehand.</p> <p>15 Q. So \$5,000 you're saying that was given</p> <p>16 to Raheem?</p> <p>17 A. And then the money was funneled back to</p> <p>18 Vasili Barbounis.</p> <p>19 Q. Who funneled the money to Vasili</p> <p>20 Barbounis?</p> <p>21 A. Lisa Barbounis and Raheem Kassam. And</p> <p>22 also Tricia McNulty took part in it, too.</p> <p>23 Q. How?</p> <p>24 A. I think we're considering adding her as</p> <p>25 a third party complaint.</p>	<p>1 trying to sleep with Tricia McNulty. It started at</p> <p>2 AIPAC in March of 2018 and then they were flirting</p> <p>3 over text messages. We'll probably see more when you</p> <p>4 produce Tricia McNulty's text messages in the McNulty</p> <p>5 case, that's still outstanding discovery obligations</p> <p>6 that you and your client in that case have. But at</p> <p>7 the outset, from what we can tell from the Barbounis</p> <p>8 text messages, is is that thousands of dollars were</p> <p>9 misappropriated in a scheme started by Lisa Barbounis</p> <p>10 before she even knew about Danny Thomas taking the</p> <p>11 money. So that's where it starts. Then the next</p> <p>12 basis for her fraudulent -- I'm speaking too fast. I</p> <p>13 apologize. I'll try to go a little bit slower.</p> <p>14 Q. Just keep going.</p> <p>15 A. I saw the look of despair on the</p> <p>16 stenographer's face. I'm really sorry. So -- I'll</p> <p>17 slow down.</p> <p>18 Okay. So then Ms. Barbounis became</p> <p>19 aware of a trip involving Congressmen Paul Gosar,</p> <p>20 representative from Arizona, and the travel of</p> <p>21 Mr. Cliff Smith, the director of the Washington</p> <p>22 Project of the Middle East Forum, and she writes to</p> <p>23 her husband back in June of 2018, wow, I would quit</p> <p>24 right now if I knew that Cliff was going instead of</p> <p>25 me. That doesn't necessarily go to the actions that</p>

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<p>1 she took, but it goes to motive. That's what we'll 2 include in our arguments as it's associated with 3 that. She goes in July of 2018 to the UK which I 4 think is for another rally or maybe the release from 5 jail for Tommy Robinson. And then she starts getting 6 involved with Danny Tommo in a more -- this was 7 before they started their sexual relationship, but 8 she gets more involved with Danny Tommo and Tommy 9 Robinson saying to her mother, oh, I would like to go 10 work for Tommy Robinson, I would like to be the PA to 11 Tommy Robinson, I would like to be able to meet him 12 after he gets out of jail. So then she travels to 13 the UK with her mother -- I think we already have 14 testimony about this --</p> <p>15 Q. You're starting to go off -- you're 16 starting to go rogue again. We need -- we're just 17 talking about the basis of the counterclaim.</p> <p>18 A. Yeah, this is the basis of the 19 complaint, Mr. Carson.</p> <p>20 Q. So you did a good job when you said the 21 5,000 with Raheem, you -- I'm just looking for the -- 22 what was -- what the damages are, that's all.</p> <p>23 A. Yeah. So the damages I would argue --</p> <p>24 Q. I don't need to hear about her mother 25 and the relationship.</p>	<p>1 to assist Mr. Robinson with his rally or release, but 2 it actually, even according to her testimony, was the 3 beginning of a love affair that took place between 4 her and Mr. Thomas. She then defrauded MEF by 5 alleging that I committed sexual harassment against 6 her in March of 2018 with the intent of what she 7 calls the Gregg plan to get me fired. That caused 8 unenumerated damages to the Middle East Forum with us 9 losing donations, that cost us leading productive 10 time, our relationships with congress -- our 11 organization was debilitated and handicapped because 12 of Ms. Barbounis's fraud. Now we get into December 13 of 2018 and that is when some of the worst examples 14 happen. She started to act as an agent for 15 Mr. Robinson to try to get him a Visa to the United 16 States, an act originally supported by Daniel Pipes, 17 but a specific message was given to Ms. Barbounis 18 saying the organization's policy was it's better for 19 Mr. Robinson to be in the UK where he can have his 20 activism rather than using company resources to try 21 to facilitate what I think Ms. Barbounis considered 22 asylum from the United Kingdom. Then in January and 23 February of 2019 Ms. Barbounis started identifying 24 herself as the director of communications for 25 TR.news. TR.news is a for-profit corporation in the</p>
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<p>1 A. Well, no, but the mother and the 2 relationship have everything to do with it.</p> <p>3 Q. But just -- I don't need the whole 4 backstory, Mr. Roman. I know it. I've been working 5 on this for two years. I just want to know the 6 damages, what the basis is.</p> <p>7 A. So the damages I guess if we want to 8 add something else -- and, by the way, just for the 9 record, I stopped in July of 2018. There is a whole 10 story to tell until even today --</p> <p>11 Q. I don't need to hear --</p> <p>12 A. -- where the conspiracy continues.</p> <p>13 Q. -- the whole stories, but go, what's 14 the basis.</p> <p>15 A. So the damages would also be the 16 after-acquired evidence that we've had from the time 17 that Lisa Barbounis started defrauding our 18 organization, so I guess we would be seeking her to 19 pay her entire salary to us that we paid to her while 20 she was defrauding us from June of --</p> <p>21 Q. Is there any other examples of her 22 defrauding you than what you've said now --</p> <p>23 A. Yes, many. So in October of 2018 she 24 misrepresented the reason why she wanted to go to the 25 United Kingdom. She said it was because she wanted</p>	<p>1 United Kingdom which was originally organized in 2 participation with a website called Politici [ph] 3 which was meant for Ms. Barbounis during that time -- 4 there is recordings that you provided to us, I can 5 play those recordings if you want to hear them, where 6 she was trying to arrange a second job in the United 7 Kingdom while at the same time representing through 8 MEF systems that she was our director of 9 communications. So it was basically like a virus 10 that took over the systems of an organization. She 11 step by step started co-opting the levers of power in 12 the organization to use MEF money, MEF time. She 13 misappropriated --</p> <p>14 Q. How much MEF money has she used?</p> <p>15 A. I would say that the damages that she's 16 directly and --</p> <p>17 Q. How much MEF -- I don't want to know 18 the total damages. I want to know how much money she 19 used that was MEF's money for any of this stuff that 20 you're saying she did.</p> <p>21 A. So -- it depends on --</p> <p>22 Q. Like if a plane ticket was 500, the 23 answer is 500.</p> <p>24 A. No. So it's not 500. If we're going 25 to do a damage assessment and calculate the damages</p>

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<p>1 --</p> <p>2 Q. Just give me a ballpark number, man.</p> <p>3 Come on.</p> <p>4 A. -- she's responsible for at least \$4</p> <p>5 million in damages done to the Middle East Forum.</p> <p>6 Q. How much?</p> <p>7 A. \$4 million is the minimum amount of</p> <p>8 what she's responsible in her damages to the Middle</p> <p>9 East Forum.</p> <p>10 Q. You're not understanding my question.</p> <p>11 MR. CARSON: All right. We can</p> <p>12 take that break now.</p> <p>13 MR. GOLD: Thank you.</p> <p>14 (A discussion was held off the record.)</p> <p>15 THE VIDEO SPECIALIST: We are off</p> <p>16 the record. It is 7:16 p.m. Eastern.</p> <p>17 (A brief recess was taken.)</p> <p>18 THE VIDEO SPECIALIST: It is 7:32</p> <p>19 p.m. Eastern and we are now on the</p> <p>20 record at 7:32 p.m. Eastern.</p> <p>21 BY MR. CARSON:</p> <p>22 Q. Who is Gabrielle Bloom, Mr. Roman?</p> <p>23 A. Well, I know a few Gabrielle -- I</p> <p>24 actually know two. I believe the one you're speaking</p> <p>25 about was an intern at the Middle East Forum.</p>	<p>1 that Gary was back, also that Marnie had made another</p> <p>2 allegation against Gregg which Gregg was very upset</p> <p>3 about because he didn't know what the allegation was.</p> <p>4 They were apparently concerned that Marnie may have</p> <p>5 gone out to find an old intern of MEF by the name of</p> <p>6 Gabrielle Bloom.</p> <p>7 So when another allegation came about</p> <p>8 you, why did you think it was Gabrielle Bloom they</p> <p>9 were talking about?</p> <p>10 A. Well, first of all, I don't think there</p> <p>11 was another allegation against me. I think that</p> <p>12 there was a misrepresentation of a phone call to</p> <p>13 Daniel Pipes by Tricia McNulty where McNulty revealed</p> <p>14 to Matt Bennett that there was a rumor that Lisa</p> <p>15 Barbounis started about me, and thereby I said to</p> <p>16 Mr. Bennett they're trying to get everyone against</p> <p>17 me, and by everyone I meant people who may have ever</p> <p>18 been employed by MEF, and I don't think this is the</p> <p>19 only name I said, I said Grayson Levy, I said Gary</p> <p>20 Gambill, who had just been rehired at that time by</p> <p>21 the Middle East Forum, I spoke about Bennett himself,</p> <p>22 and the reason why I was speaking to Bennett was</p> <p>23 because he was helping me with a story that I was</p> <p>24 writing, and I actually believe it was he who</p> <p>25 initiated phone calls with me rather than I who</p>
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<p>1 Q. Did you guys pay her money?</p> <p>2 A. You guys, the Middle East Forum.</p> <p>3 Q. Sure.</p> <p>4 A. At the direction of Lara Szott and the</p> <p>5 suggestion of Marnie Meyer she received a agreement</p> <p>6 for four projects of extra work in the summer of 2016</p> <p>7 or '17. Of how much she accomplished, you have to</p> <p>8 ask Lara since she was her supervisor.</p> <p>9 Q. So do you recall a telephone call</p> <p>10 between you and Matthew Bennett --</p> <p>11 A. Matt Bennett and I have had countless</p> <p>12 phone calls. Which one are you referring to?</p> <p>13 Q. I wasn't done the question.</p> <p>14 So -- I'm going to put a document in</p> <p>15 front of you.</p> <p>16 A. Okay.</p> <p>17 Q. So it's way up -- past it. All right.</p> <p>18 So I'm going to put a document in front of you and</p> <p>19 it's going to look like this. So Tricia McNulty sent</p> <p>20 an e-mail to Gregg Roman like this. She sent -- and</p> <p>21 she talks about this phone call. I received a phone</p> <p>22 call from Matt Bennett last night. He started the</p> <p>23 conversation with pleasantries but then began to</p> <p>24 discuss current MEF internal operations. He is</p> <p>25 apparently speaking to Gregg every two days, knew</p>	<p>1 initiated phone calls with him.</p> <p>2 Q. The other claim against you was a claim</p> <p>3 that Marnie Meyer made where she said that you were</p> <p>4 spreading rumors about her and Caitriona Brady's</p> <p>5 father. Do you recall that?</p> <p>6 A. No, I never spoke with Meyer or Brady</p> <p>7 about that, but the e-mails that I've seen since this</p> <p>8 litigation began show that Lisa Barbounis started</p> <p>9 that rumor, not Marnie Meyer.</p> <p>10 Q. What e-mail have you seen that shows</p> <p>11 that Lisa Barbounis started that rumor?</p> <p>12 A. There was a communication between</p> <p>13 Daniel Pipes and Lisa Barbounis where Daniel asks I</p> <p>14 believe it was either Marnie or Lisa where did you</p> <p>15 hear this rumor, Marnie says Lisa, and then the</p> <p>16 question is was that before or after November 2018,</p> <p>17 and Lisa says before.</p> <p>18 Q. Weren't they talking about when you</p> <p>19 spread the rumor?</p> <p>20 A. That's a question based on a factual</p> <p>21 predicate that didn't exist, Mr. Carson. I never</p> <p>22 spread any rumor --</p> <p>23 Q. But --</p> <p>24 A. -- or started --</p> <p>25 Q. -- that's what they were referring to,</p>

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<p>1 right?</p> <p>2 A. I don't know what they were referring</p> <p>3 to. I think that they were actually referring to the</p> <p>4 groundwork they were laying to prepare for litigation</p> <p>5 against the Middle East Forum.</p> <p>6 Q. In April of 2019 that's what your</p> <p>7 testimony is, that they were laying groundwork for</p> <p>8 litigation?</p> <p>9 A. My testimony is that after this</p> <p>10 litigation began I had the opportunity to review</p> <p>11 thousands of messages between Meyer and McNulty and</p> <p>12 Brady and Barbounis and Yonchek and also the messages</p> <p>13 between Barbounis and dozens of other individuals in</p> <p>14 the United Kingdom and also Belgium and Canada and</p> <p>15 Texas --</p> <p>16 Q. Mr. Roman --</p> <p>17 A. -- and Washington D.C. --</p> <p>18 Q. -- I asked you --</p> <p>19 A. I'm answering your question.</p> <p>20 Q. It has nothing to do with text messages</p> <p>21 in the United Kingdom.</p> <p>22 A. It has everything to do with it, Mr.</p> <p>23 Carson.</p> <p>24 Q. I asked you if they were referring to</p> <p>25 something that happened before November of 2018,</p>	<p>1 Daniel Pipes?</p> <p>2 A. Whenever the top of the time stamp has</p> <p>3 the e-mail addressed to it. I don't remember the</p> <p>4 exact day, Mr. Carson --</p> <p>5 Q. What did you say in the e-mail?</p> <p>6 A. I don't remember what I said,</p> <p>7 Mr. Carson.</p> <p>8 Q. Did Mr. Pipes ever talk to you about it</p> <p>9 in person?</p> <p>10 A. Not that I remember -- well, yes, he</p> <p>11 did, Mr. Carson.</p> <p>12 Q. Did he talk to you about it in person</p> <p>13 back in the middle of 2019?</p> <p>14 A. No, Mr. Carson. The only time I was</p> <p>15 with Daniel Pipes in the middle of 2019 was twice,</p> <p>16 once to record videos that were for MEF's 2019 --</p> <p>17 Q. When I say talk to you in person --</p> <p>18 when I say talk in person, that includes phone calls.</p> <p>19 A. No, I don't remember speaking to him</p> <p>20 over the phone about --</p> <p>21 THE COURT REPORTER: Sorry.</p> <p>22 Repeat that, Mr. Carson.</p> <p>23 BY MR. CARSON:</p> <p>24 Q. When I say talk in person, I don't mean</p> <p>25 face to face, I mean have a conversation that's not</p>
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<p>1 isn't that what they were talking about.</p> <p>2 A. No, and I answered that, I said that</p> <p>3 question was based on a factual predicate that</p> <p>4 doesn't exist, thereby there was no rumor.</p> <p>5 Q. The allegation was is that you said</p> <p>6 that the only reason Marnie Meyer got her job was</p> <p>7 because she was trading sex with Caitriona Brady's</p> <p>8 father, right?</p> <p>9 A. No, you then asked me what was the</p> <p>10 groundwork for that allegation --</p> <p>11 Q. Wasn't that the allegation?</p> <p>12 A. No, I don't know what the allegation</p> <p>13 was because I never heard the allegation, Mr. Carson,</p> <p>14 nor do I know what rumor you're talking about.</p> <p>15 Q. Mr. Pipes never talked to you about it?</p> <p>16 A. If you'll let me finish my answer, I</p> <p>17 said I never heard the allegation or the rumor from</p> <p>18 any of those involved. I received an e-mail --</p> <p>19 Q. Did you hear it from Mr. Pipes?</p> <p>20 A. I received an e-mail from Daniel Pipes</p> <p>21 which laid out what these other people had</p> <p>22 misrepresented and had lied about, and then I had to</p> <p>23 answer that e-mail, and I think you probably have a</p> <p>24 copy of the answer that I gave.</p> <p>25 Q. Well, when did you get the e-mail from</p>	<p>1 electronic, phone calls included. Okay? That's what</p> <p>2 I mean.</p> <p>3 A. Right. No, what I remember is is that</p> <p>4 whenever there was an allegation that was of a legal</p> <p>5 nature or anything dealing with anything that was</p> <p>6 innuendo or sexual or anything of a personal nature</p> <p>7 it was always either done with counsel or it was done</p> <p>8 electronically so there was a record that would be</p> <p>9 established in the case of eventual litigation like</p> <p>10 this.</p> <p>11 Q. Well, so have you ever sat down and</p> <p>12 talked to Mr. Pipes by phone, in person, any way, by</p> <p>13 Facebook, voice messenger, by -- you know, any time</p> <p>14 where you and Mr. Pipes had a conversation with each</p> <p>15 other, did you guys ever sit down and have a</p> <p>16 conversation about these allegations that Marnie</p> <p>17 Meyer made in April 2019?</p> <p>18 A. No.</p> <p>19 Q. Did you ever have a conversation of</p> <p>20 that nature about any of the allegations that Lisa or</p> <p>21 Marnie or Patricia made?</p> <p>22 A. With counsel?</p> <p>23 Q. No, with Dr. Pipes.</p> <p>24 A. Just with him alone.</p> <p>25 Q. Where you and Dr. Pipes had a</p>



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<p>1 conversation about -- where you talked about it, 2 where you guys had a discussion.</p> <p>3 A. No, we've only communicated about this 4 in the presence of counsel and not with each other 5 but just with our attorneys.</p> <p>6 Q. I don't understand what you mean by 7 that, so --</p> <p>8 A. So I'm in a room, okay, and there is an 9 attorney there, and the attorney is saying, 10 Mr. Roman, A, B, C, privilege, privilege, privilege, 11 and I respond, Mr. Attorney, X, Y, Z. Never did I 12 have a direct conversation with Daniel Pipes about 13 any of the allegations that was not in the presence 14 of counsel.</p> <p>15 Q. Well, how many --</p> <p>16 A. Meaning, we have a -- we have a policy 17 in place that whenever there is anything of a legal 18 nature we make sure that we follow the proper 19 channels, policies, and procedures, to do three 20 things. Number one, to make sure --</p> <p>21 Q. I don't need to know -- I don't need to 22 know your -- the policies. I just am --</p> <p>23 A. Okay.</p> <p>24 Q. -- questioning about the conversation. 25 So how many --</p>	<p>1 Q. That's what I'm asking you about. Have 2 you ever had a conversation --</p> <p>3 A. And I'm -- I'm trying to finish this, 4 Mr. Carson. For at least the first year from 5 November of 2018 until October or November of 2019 6 there was no one-on-one discussions besides ones in 7 which he would say -- and it depends on the 8 allegation that we're talking about, but the general 9 gist of it was there are a plethora of things that 10 have been said about you, we have to mitigate risk to 11 the organization, and that's why you're no longer in 12 administration, and we only started talking about 13 litigation strategy, really talking about litigation 14 strategy, after your clients filed their lawsuits in 15 late October of 2019.</p> <p>16 Q. So before that how many times did you 17 and Mr. Pipes have an in-person conversation, that 18 includes telephone calls, how many times before that 19 did you guys have in-person conversation about the 20 allegations made by Lisa, by Patricia, or by Marnie?</p> <p>21 A. Well, there was the one time that he 22 told me that I was removed and he had suggested that 23 this was because -- just on a dialogue that we had 24 gone on beforehand a few hours ago, Mr. Roman, 25 accusations have been made against you, in response I</p>
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<p>1 A. Which conversation?</p> <p>2 Q. -- of these conversations did you have 3 where counsel was there, how many of these types of 4 conversations did you have?</p> <p>5 A. About which, about sexual --</p> <p>6 Q. About any of the allegations in this 7 case or with Patricia McNulty.</p> <p>8 A. There have been countless conversations 9 with counsel since November 1st, 2018, in multiple 10 stages, but they really started picking up after you 11 filed your EEOC complaint. Sorry, not -- they're not 12 yours. After --</p> <p>13 Q. I'm not -- so I'm talking about in 14 connection with your employment, so I'm not talking 15 about litigation strategy sessions, I'm talking about 16 did Mr. Pipes ever have a conversation with you, 17 whether counsel was there or not, about any of these 18 allegations in person where it was a discussion about 19 just the allegations and how you were going to handle 20 it and, like, you know, where he was telling you, 21 like, these allegations are serious, did that ever 22 happen?</p> <p>23 A. When I have spoken with him about these 24 allegations it has always been in the presence of 25 counsel and for at least the first --</p>	<p>1 am taking you out of administration of the 2 organization.</p> <p>3 Q. Okay.</p> <p>4 A. And then the next conversation which 5 was of a direct relation to this nature counsel was 6 present but just the two of us. Mr. Roman, they have 7 been EEOC complaints filed against the organization, 8 you're going to have to work with counsel to be able 9 to address this, and that was both in-house and 10 outside counsel, and then the last time that we -- 11 before litigation was filed was when you were sending 12 demand letters for millions of dollars to the Middle 13 East Forum and we were determining the strategy of -- 14 well, that's a strategy question, so I really -- 15 can't really comment on that, but we discussed in 16 general how we thought that this was un -- I don't 17 want to say that -- or strike that. We were 18 discussing in general how -- I'm trying to find the 19 best words to represent the sense of sorrow that I 20 felt about your clients related to that they had been 21 wrapped into this web of lies that you were then 22 allowing them to try to litigate against us. And 23 after that, October 26th, 27th, there were many 24 discussions, not one-on-one, but with counsel, of 25 what I remember, what Dr. Pipes remembers, of what</p>

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<p>1 staff did, interviews, and that's when we really 2 started getting into it of unraveling everything. 3 Q. In March, April, and May did Mr. Pipes 4 ever talk to you about retaliation in person? 5 A. March, April, and May of when? 6 Q. 2019. 7 A. What do you mean retaliation? 8 Q. Did he ever talk to you about 9 retaliation? 10 A. You have to be more specific. 11 Q. No, I'm being specific. 12 MR. CAVALIER: Object to form. 13 BY MR. CARSON: 14 Q. Retaliation. Did he ever come -- did 15 he ever call you on the phone, did he ever have a 16 conversation with you, did you guys ever have a 17 conversation about retaliation? 18 MR. CAVALIER: Object to form. 19 THE WITNESS: I really don't know 20 what you're talking about, Mr. Carson. 21 BY MR. CARSON: 22 Q. Do you know what retaliation is? 23 A. Well, you can retaliate against a 24 quarterback, you can retaliate against a hit to your 25 team --</p>	<p>1 Q. I'm talking about the legal definition. 2 If you don't know -- 3 A. No, no, but I'm just trying to say this 4 is -- you're asking me my perspective, right? 5 Q. No, I'm asking if you know what the 6 legal definition of retaliation is. 7 A. So I'm -- 8 Q. If you don't, I will tell you. Just 9 say, no, I don't know, and I'll tell you. 10 A. Mr. Carson, you have filed multiple 11 retaliation -- 12 Q. I'm not asking you about what I filed. 13 I'm asking you if you understand what retaliation is. 14 A. Mr. Carson, I believe -- I believe my 15 understanding of retaliation is different from your 16 understanding of retaliation. 17 Q. Okay. It sounds like you don't know, 18 so let me explain. Retaliation specifically refers 19 to acts that are taken adverse to an employer's -- 20 employee's interest because they reported 21 discrimination or harassment in the workplace. 22 That's the legal definition. 23 MR. GOLD: That's not quite 24 accurate, but -- it's adverse actions 25 are taken against one who voices</p>
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<p>1 Q. Do you know what retaliation is with 2 respect to the types of claims that we're dealing 3 with? 4 MR. CAVALIER: Object to form. 5 THE WITNESS: Well, one of the 6 things that you categorize as 7 retaliation in your EEOC complaint from 8 December of 2019 -- 9 BY MR. CARSON: 10 Q. Just -- 11 A. I'm talking about that. I'm talking 12 about that. 13 Q. I'm asking you -- just say yes or no. 14 If you don't know, I'll help you understand it. Do 15 you know what retaliation is with respect to the EEOC 16 and with respect to Title 7 and the Pennsylvania -- 17 A. Well, Mr. Carson -- 18 MR. GOLD: Objection. Calls for a 19 legal conclusion. Why don't you explain 20 it to him first and then ask the 21 question. 22 BY MR. CARSON: 23 Q. Do you know what that is? 24 A. Well, there's what you in your 25 profession as a lawyer consider to be retaliation --</p>	<p>1 opposition to discrimination or sexual 2 harassment -- 3 MR. CARSON: Mr. Gold -- 4 MR. GOLD: -- not just adverse -- 5 adverse actions. Go ahead. 6 MR. CARSON: Mr. Gold's been doing 7 this a lot longer -- 8 BY MR. CARSON: 9 Q. So with that understanding I'm asking 10 did Mr. Pipes ever talk to you about retaliation, 11 whether -- like, did he ever say to you, Mr. Roman, 12 you have to be careful not to do anything that could 13 be conceived as retaliation? 14 MR. CAVALIER: Object to form and 15 also I'll ask the witness to be aware of 16 the fact that if such communications 17 occurred they may have occurred in the 18 presence of counsel -- 19 MR. CARSON: That doesn't matter 20 if Dr. Pipes said it. It doesn't -- 21 there is no privilege if -- no matter 22 where it's said. 23 THE WITNESS: What -- I'm lost 24 here. Who asked me what? 25 MR. GOLD: I also -- if there's a</p>

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<p>1 conversation that occurs with Mr. Pipes 2 present and Mr. Fink is offering counsel 3 to both -- 4 MR. CARSON: I'm not talking about 5 Marc Fink. I'm asking the question 6 about Mr. Pipes. 7 BY MR. CARSON: 8 Q. Did Mr. Pipes ever talk to you about 9 retaliation -- I don't know why this is such a hard 10 question to answer. It's not a hard question. Did 11 -- and it's -- I'm -- the question specifically 12 refers to March, April, May 2019. During those 13 months did Mr. Pipes ever talk to you about 14 retaliation? 15 A. In what context? It's pretty broad. 16 Q. In the context of the reports of 17 discrimination or harassment that were made by Marnie 18 Meyer, Patricia Barbounis, and -- I'm sorry, Lisa 19 Barbounis and Patricia McNulty. 20 A. Not that I can remember, no. 21 Q. So did he ever talk to you about it in 22 a specific context due to any e-mails that he 23 received from Ms. McNulty or Ms. Barbounis? 24 A. No, not that I remember. 25 Q. Did he ever tell you that he received</p>	<p>1 Q. Well, you understand that it wouldn't 2 matter whether you called them that if they -- if the 3 allegation's made it would be reasonable to have a 4 discussion with you about it, correct? 5 MR. CAVALIER: Object -- 6 THE WITNESS: All allegations 7 which were made against anyone at the 8 Middle East Forum was done through 9 counsel. Mr. Pipes never directly said 10 to me without the presence of counsel 11 this, this, and this was said, this, 12 this, and this is how you respond. He 13 has sent me e-mails which may have had 14 complaints of a nonsexual variety that 15 did not relate to any other items that 16 you are addressing right now which may 17 have said why are you asking about the 18 audit, why are you asking about 19 fundraising, but those are all 20 operational questions that the head of 21 an organization can ask people who work 22 for him. So, no, he never did that in 23 the context of a sexual harassment or a 24 retaliation as you had defined it or Mr. 25 Gold defined it earlier nature.</p>
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<p>1 e-mails from Ms. McNulty or Ms. Barbounis where they 2 alleged that they were being retaliated against? 3 A. No -- I don't remember if he ever said 4 anything to me. He may have forwarded me e-mails 5 from McNulty and from Meyer asking me to answer them. 6 Q. So did he ever tell you that they made 7 the allegation that you had called them usurpers? 8 A. Oh, that's another thing. That's a 9 great story. 10 THE COURT REPORTER: Called them 11 what? 12 MR. CARSON: Usurpers. 13 THE WITNESS: U-s-u-r-p-e-r-s. 14 BY MR. CARSON: 15 Q. So -- 16 A. That's one -- Mr. Carson, that's one of 17 my taglines from the radio. 18 Q. Okay. So the question is, though, did 19 Mr. Pipes ever talk to you about an allegation that 20 you had called these women usurpers? 21 A. No, I never called them usurpers. 22 Q. But did he -- whether you called them 23 that or not, did he ever talk to you about it? 24 A. I don't think so, because I never 25 called them that.</p>	<p>1 BY MR. CARSON: 2 Q. Did you call Raquel Swazetti [ph], who 3 I think is better known as Eman Patel, did you call 4 her a walking lawsuit? 5 A. No, I did not. 6 Q. Did you say that she's a walking 7 lawsuit because she is a woman, she's gay, and she's 8 Muslim? 9 A. No, Mr. Carson, that question is based 10 on a factual predicate that did not happen. I never 11 called Ms. Saraswati or Eman Patel a walking lawsuit. 12 In fact, I celebrated her diversity and I was so 13 proud when I presided over a -- I can preside over 14 weddings, I have a license to preside over common law 15 marriages from the Universal Life Church which grants 16 this ability. When I presided over the wedding of my 17 best friend Ryan who lives in Los Angeles now and his 18 husband Joe in Brooklyn of May of 2016 I think, and 19 the first person I told when they asked me to 20 officiate the wedding was Eman Patel. I'm so happy 21 that she got to move on from the Middle East Forum to 22 work in the capacity of -- I think diversity 23 coordinator for an LGBT resource center in 24 Philadelphia. She's really somebody I admire. So, 25 no, I would never call her a walking lawsuit --</p>

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<p>1 Q. Well, you --</p> <p>2 A. -- and I would never criticize -- what</p> <p>3 did you say?</p> <p>4 Q. You forced her out of the Forum, right?</p> <p>5 A. I never forced her out of any</p> <p>6 organization. She left MEF, and when she left MEF I</p> <p>7 remember communicating with her saying is this really</p> <p>8 what you want to do, and she said I want to take a</p> <p>9 break, I'm looking for something more in my lane,</p> <p>10 which was associated with diversity, and I think MEF</p> <p>11 gave her severance bonus of salary several times of</p> <p>12 what she had had, and I actually have the note that</p> <p>13 she wrote to me when she left the organization</p> <p>14 thanking me for the work that we had done together,</p> <p>15 and I'm sure that we can get you that correspondence.</p> <p>16 Q. Do you know --</p> <p>17 A. There never any there ill will --</p> <p>18 Q. Do you know who Rosie is?</p> <p>19 A. Hold on. There was never any ill will</p> <p>20 between myself and Eman Patel. I honor her, I</p> <p>21 cherish her, and I think the world of her.</p> <p>22 Q. Are you sure that she doesn't have ill</p> <p>23 will?</p> <p>24 A. She may, but --</p> <p>25 THE COURT REPORTER: I didn't hear</p>	<p>1 A. No one named --</p> <p>2 Q. She was asked to transition to a</p> <p>3 position as your assistant?</p> <p>4 A. No one named Rosie ever worked for the</p> <p>5 Middle East Forum.</p> <p>6 Q. She said I'll be dead before I work for</p> <p>7 Gregg Roman?</p> <p>8 A. Mr. Carson, again, that is a question</p> <p>9 based on a factual predicate that never happened, so</p> <p>10 you're misrepresenting anything that you're talking</p> <p>11 about.</p> <p>12 Q. Did you ever rub your --</p> <p>13 A. Beyond that --</p> <p>14 Q. -- body against a female employee?</p> <p>15 A. Beyond that --</p> <p>16 THE COURT REPORTER: I can't hear</p> <p>17 you, Mr. Carson.</p> <p>18 BY MR. CARSON:</p> <p>19 Q. Did you ever rub your body against a</p> <p>20 female employee --</p> <p>21 A. Mr. Carson, I'm not done the question</p> <p>22 about --</p> <p>23 THE COURT REPORTER: I still can't</p> <p>24 hear you.</p> <p>25 BY MR. CARSON:</p>
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<p>1 the question. I didn't hear the</p> <p>2 question.</p> <p>3 BY MR. CARSON:</p> <p>4 Q. I said are you sure she doesn't have</p> <p>5 ill will.</p> <p>6 A. She may, but the last time I spoke with</p> <p>7 her was in probably September or October of 2019 when</p> <p>8 I was asking how she was doing.</p> <p>9 Q. Are you sure she doesn't feel like she</p> <p>10 was constructively discharged?</p> <p>11 A. I don't know what you mean by that, Mr.</p> <p>12 Carson.</p> <p>13 Q. Her work -- her work life was made so</p> <p>14 miserable that she quit and any reasonable person in</p> <p>15 her shoes would have quit under those same</p> <p>16 conditions.</p> <p>17 A. No, I don't think she felt that way,</p> <p>18 and if she did I wish that she would talk to me about</p> <p>19 it because we could have an honest conversation why</p> <p>20 she felt that way.</p> <p>21 Q. Well, did you -- what about Rosie,</p> <p>22 Rose, do you know her?</p> <p>23 A. Who is Rosie?</p> <p>24 Q. She was an employee of the Middle East</p> <p>25 Forum --</p>	<p>1 Q. I said did you ever rub your body</p> <p>2 against a female employee while you were working with</p> <p>3 them?</p> <p>4 A. No, I did not.</p> <p>5 Q. Ever force a female employee to sit</p> <p>6 next to you behind your desk and watch the computer</p> <p>7 screen with you?</p> <p>8 A. No, I did not.</p> <p>9 Q. Ever call female employees at</p> <p>10 inappropriate hours after -- you know, at the end of</p> <p>11 the day, at nighttime?</p> <p>12 A. Your characterization of that question</p> <p>13 of what an inappropriate hour requires clarification.</p> <p>14 Can you please be more specific?</p> <p>15 Q. Well, they're on their own private time</p> <p>16 at the end of the day, when they're not working.</p> <p>17 A. Mr. Carson, we have two kinds of</p> <p>18 employees at the Middle East Forum. We have</p> <p>19 administrative employees who work from 9 to 5 and</p> <p>20 they're sometimes asked to work in off-hours, and we</p> <p>21 also have professional employees who are expected to</p> <p>22 be on the clock at any given time. For instance, if</p> <p>23 I'm in Israel and it's 12 p.m., there's a seven-hour</p> <p>24 time difference with our employees in the United</p> <p>25 States, so it would be 5 a.m., so it would not be</p>



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<p>beyond the pale of comprehension that we would ask an employee who was a professional exempt employee, I'm sure you're familiar with that term, to work at hours which may not have been regular according to a 9 to 5 schedule. So if you're asking did I ever communicate with someone from MEF outside of the 9 to 5 work time, yes, of course I did. If you're asking if I ever did it inappropriately, no, it was always appropriate and relevant to the task at hand.</p> <p>Q. Lisa Barbounis was a 9 to 5, though, wasn't she?</p> <p>A. No, she was not. She was a professional exempt employee.</p> <p>Q. She's a executive assistant.</p> <p>A. No, she wasn't. She was an executive liaison -- she specifically requested to be an exempt employee when she started working for MEF because she did not want to be equated with an assistant. She asked for that title. It's in an e-mail actually that she sent to us when she was negotiating with us. She got higher pay, she got more money for health insurance. She was a very good negotiator.</p> <p>Q. You fired Tiffany Lee because she reported sexual harassment?</p> <p>A. No, I did not. I fired Tiffany Lee --</p>	<p>BY MR. CARSON:</p> <p>Q. Don't you find that a coincidence, like there's -- every -- you respond to every single allegation of sexual harassment the same way -- (Simultaneous speakers.)</p> <p>THE COURT REPORTER: I can't hear. I can't hear the question. Please repeat it. (Simultaneous speakers.)</p> <p>THE COURT REPORTER: I didn't hear the question or anything after it.</p> <p>BY MR. CARSON:</p> <p>Q. You respond to every single allegation of sexual harassment by the plethora of women who have made them in the last five years the exact same way. They're all liars, aren't they?</p> <p>A. No, Mr. Carson.</p> <p>MR. CAVALIER: Object to form.</p> <p>MR. GOLD: Argumentative. Assumes facts not in evidence. Predicate of the question is absolutely false. I'm going to ask you to rephrase the question.</p> <p>MR. CAVALIER: I didn't hear a question; it's a statement you made.</p> <p>BY MR. CARSON:</p>
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<p>actually I didn't do it. Marnie Meyer was the one who fired Tiffany Lee, and that was done after Tiffany Lee was the subject of I think an improvement plan that was put together. She failed to attain the goals of the improvement plan, she failed to go to an event, and then she tried to defraud the organization by demanding millions of dollars from us after Derek Smith Law Group misrepresented text messages that she put forward, deconstructed those text messages, and then we never heard from her again.</p> <p>Q. Isn't it interesting how every woman who accuses you of sexual harassment defrauds the Middle East Forum and owes you millions of dollars? (Simultaneous speakers.)</p> <p>THE COURT REPORTER: I need you to repeat the question and anything that was said after it, please.</p> <p>BY MR. CARSON:</p> <p>Q. Why do you claim that every single woman who has accused you of sexual harassment owes the Forum millions of dollars?</p> <p>MR. CAVALIER: Object to form.</p> <p>THE WITNESS: Mr. Carson -- sorry.</p> <p>MR. CAVALIER: Object to form.</p> <p>THE WITNESS: Can I answer?</p>	<p>Q. Is there a woman who has accused you of sexual harassment who is not a liar?</p> <p>MR. CAVALIER: Object to form.</p> <p>THE WITNESS: Mr. Carson, you have to be more specific.</p> <p>BY MR. CARSON:</p> <p>Q. Well, is there one woman that has accused you of sexual harassment that you can name who is not a liar?</p> <p>A. No, Mr. --</p> <p>MR. CAVALIER: Same objection.</p> <p>THE WITNESS: -- Mr. Carson, I sat here this evening and I heard you say that one woman didn't accuse me of sexual harassment and then you said that -- I'm sorry, I said that she did accuse me of sexual harassment, you then said that she did accuse me of sexual harassment. I said, Mr. Carson, look at your complaint. You went back to it and then you saw that, hold on, I actually did, it was a typo. So every time -- every time I've been accused of sexual harassment it has been by a client of the Derek Smith --</p>

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<p>1 BY MR. CARSON:</p> <p>2 Q. That's not true.</p> <p>3 A. -- Law Group.</p> <p>4 Q. Is it?</p> <p>5 A. No, Mr. Carson. Every time I have been</p> <p>6 accused of sexual harassment it has been done by a</p> <p>7 client of the Derek Smith Law Group.</p> <p>8 Q. You think that's evidence?</p> <p>9 A. No, I think what it is is a pattern</p> <p>10 that speaks to the veracity of those claims, so it's</p> <p>11 not about --</p> <p>12 Q. I'll repeat the question --</p> <p>13 A. Sure.</p> <p>14 Q. -- since you avoided answering it.</p> <p>15 Is there a single woman who has accused</p> <p>16 you of sexual harassment who you haven't called a</p> <p>17 liar?</p> <p>18 MR. CAVALIER: Object to form.</p> <p>19 THE WITNESS: Mr. Carson --</p> <p>20 BY MR. CARSON:</p> <p>21 Q. You respond to every single --</p> <p>22 A. -- you are --</p> <p>23 Q. -- allegation --</p> <p>24 A. -- you are saying that I categorized</p> <p>25 women as liars. Okay? I didn't say that in every</p>	<p>1 A. Mr. Carson --</p> <p>2 Q. -- Delaney Yonchek.</p> <p>3 A. -- I will -- I will represent to you --</p> <p>4 Q. Are they liars?</p> <p>5 THE COURT REPORTER: One at a</p> <p>6 time.</p> <p>7 BY MR. CARSON:</p> <p>8 Q. Just answer the question. Are they --</p> <p>9 A. My answer is --</p> <p>10 THE COURT REPORTER: I can't hear</p> <p>11 the question.</p> <p>12 BY MR. CARSON:</p> <p>13 Q. We're going to get through this list</p> <p>14 and then we're going to be done. Is Caitriona Brady</p> <p>15 a liar?</p> <p>16 MR. GOLD: You're going to be done</p> <p>17 in one more minute.</p> <p>18 BY MR. CARSON:</p> <p>19 Q. Is Caitriona Brady a liar?</p> <p>20 A. Yes.</p> <p>21 MR. CARSON: We're done the first</p> <p>22 deposition in one minute, not the second</p> <p>23 one.</p> <p>24 BY MR. CARSON:</p> <p>25 Q. Is Delaney Yonchek a liar?</p>
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<p>1 claim. We went over a whole list of people today,</p> <p>2 and I didn't call everyone a liar.</p> <p>3 Q. You called Lisa Barbounis a liar.</p> <p>4 A. She is.</p> <p>5 Q. You called Patricia McNulty a liar.</p> <p>6 A. She is.</p> <p>7 Q. You called Marnie Meyer a liar.</p> <p>8 A. I didn't call her a liar; I called her</p> <p>9 a fraud.</p> <p>10 Q. You called Caitriona Brady a liar.</p> <p>11 A. You said Caitriona Brady didn't accuse</p> <p>12 me of sexual harassment, so I don't know how to</p> <p>13 answer you.</p> <p>14 Q. She accused you of discrimination and</p> <p>15 harassment based on her sex.</p> <p>16 A. But you said earlier she didn't accuse</p> <p>17 me of harassment.</p> <p>18 Q. No, I said she didn't accuse you of</p> <p>19 sexual misconduct.</p> <p>20 MR. GOLD: Exactly two minutes to</p> <p>21 go here. Let's go. Two minutes. Wrap</p> <p>22 it up.</p> <p>23 BY MR. CARSON:</p> <p>24 Q. She accused you of discrimination and</p> <p>25 harassment based on her sex, and so does --</p>	<p>1 A. In what context?</p> <p>2 Q. Her allegations that she made.</p> <p>3 A. Yes, that's why she dismissed her</p> <p>4 complaint.</p> <p>5 Q. You think that's why she would say she</p> <p>6 dismissed her complaint, because it wasn't true?</p> <p>7 A. I think that when she answered</p> <p>8 questions about the veracity of her complaint in her</p> <p>9 deposition that took place back in March when I was</p> <p>10 there in person, the first and the last time I've</p> <p>11 seen you, was quite revealing, Mr. Carson. She was</p> <p>12 asked whether or not she had said something that was</p> <p>13 in her complaint, and she said no, and then when</p> <p>14 Mr. Dave Walton asked her, well, you put it in your</p> <p>15 complaint, and she responded, oh, my lawyer did that.</p> <p>16 So, no, Mr. Carson, I think that in some cases these</p> <p>17 women had been manipulated by you and your law firm</p> <p>18 into delusions of grandeur based on your ability to</p> <p>19 try to get 40 percent of the 30 plus million dollars</p> <p>20 that you've been trying to acquire from our</p> <p>21 organization. So --</p> <p>22 Q. So you're a victim.</p> <p>23 A. -- it's not so much that they're liars.</p> <p>24 They have been duped and deceived by you and your</p> <p>25 colleagues.</p>

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<p>1 Q. So you're a victim in all this; is that 2 right?</p> <p>3 MR. GOLD: Let's go. Last 4 question.</p> <p>5 THE WITNESS: I can't hear you.</p> <p>6 THE COURT REPORTER: I can't hear 7 anyone right now.</p> <p>8 BY MR. CARSON:</p> <p>9 Q. Are you the victim in all this?</p> <p>10 A. The victim of what?</p> <p>11 Q. Are you a victim?</p> <p>12 A. Mr. Carson --</p> <p>13 Q. Do you have any responsibility at all, 14 personal responsibility, for any of the allegations 15 that have been made regarding you.</p> <p>16 MR. GOLD: Objection -- 17 (Simultaneous speakers.)</p> <p>18 THE COURT REPORTER: You're going 19 to have to repeat the question.</p> <p>20 MR. CARSON: Guys, everyone keeps 21 interrupting me. Like, stop.</p> <p>22 MR. GOLD: No one is interrupting 23 you at all.</p> <p>24 MR. CARSON: Yeah, every time I 25 ask a question I hear five different</p>	<p>1 organization and hiring these people who 2 at the end of the day ended up trying to 3 go out on a mission to be able to ruin 4 all organization and to allow a law firm 5 like yours to go so far as to cause 6 this. So if I take responsibility for 7 this, Mr. Carson, the responsibility 8 that I take is is that I didn't see this 9 coming earlier, and, had I, we wouldn't 10 be here right now. It's not about 11 allegations of harassment. What it's 12 about is a concerted effort to try to 13 destroy us. And that, Mr. Carson, is my 14 final answer.</p> <p>15 (Simultaneous speakers.)</p> <p>16 BY MR. CARSON:</p> <p>17 Q. Which is why you are the victim, right? 18 You're the victim.</p> <p>19 THE COURT REPORTER: I can't hear 20 anybody right now.</p> <p>21 MR. GOLD: Game over.</p> <p>22 MR. CARSON: Well, I -- it's -- 23 well, we can't go off the record until 24 we all say yes, right?</p> <p>25 MR. GOLD: Game over. Last</p>
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<p>1 voices going and everyone has to stop 2 talking.</p> <p>3 MR. GOLD: There's only one person 4 here and it's my voice. Objection. It 5 is a compound question.</p> <p>6 MR. CARSON: No, it's not.</p> <p>7 BY MR. CARSON:</p> <p>8 Q. The question is this. Do you take any 9 responsibility at all? It's my last question.</p> <p>10 MR. GOLD: That's the last 11 question.</p> <p>12 BY MR. CARSON:</p> <p>13 Q. Do you take any responsibility at all 14 for any of the allegations that any woman has ever 15 made against you for sexual harassment?</p> <p>16 MR. CAVALIER: Object to form.</p> <p>17 BY MR. CARSON:</p> <p>18 Q. Do you take any personal 19 responsibility, yes or no?</p> <p>20 MR. CAVALIER: Same objection.</p> <p>21 THE WITNESS: Yes. The 22 responsibility that I take is one that I 23 allowed individuals to deceive, defraud, 24 and to cause countless hours, countless 25 days, countless years, of damage to this</p>	<p>1 question.</p> <p>2 BY MR. CARSON:</p> <p>3 Q. So it's why -- that's why you're the 4 victim, right? Because of what you just said.</p> <p>5 MR. GOLD: No more questions, no 6 more answers. We're done. Seven hours. 7 We're done.</p> <p>8 MR. CARSON: It hasn't been seven 9 hours.</p> <p>10 MR. GOLD: It has been seven 11 hours. We agreed. It's now 8:07. 12 We're done.</p> <p>13 MR. CARSON: All right. That's 14 part one.</p> <p>15 MR. GOLD: Have as many parts as 16 you need under the law.</p> <p>17 MR. CARSON: Thank you. 18 Appreciate it.</p> <p>19 (A discussion was held off the record.)</p> <p>20 THE VIDEO SPECIALIST: It is 8:08 21 p.m. Eastern. We are off the record.</p> <p>22 - - -</p> <p>23 (The proceedings concluded at 8:08 p.m.)</p> <p>24</p> <p>25</p>

C E R T I F I C A T E

I HEREBY CERTIFY that the proceedings and evidence are contained fully and accurately, to the best of my ability, in the notes of testimony taken by me in the proceedings of the above cause, and that the copy is a correct transcript of the same.

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Carrie A. Kaufman  
Registered Professional Reporter  
Notary Public



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<b>backing</b> (2)	<b>bifurcate</b> (2)	<b>British</b> (1)	<b>Carson's</b> (1)
<b>backstory</b> (3)	<b>big</b> (5)	<b>Brits</b> (1)	<b>Case</b> (37)
<b>bad</b> (3)	<b>Bill</b> (2)	<b>broached</b> (2)	<b>cases</b> (4)
<b>Bair</b> (5)	<b>binary</b> (2)	<b>broad</b> (3)	<b>Casey</b> (1)
<b>Bala</b> (1)	<b>birthday</b> (2)	<b>Brody</b> (1)	<b>Cast</b> (1)
<b>balcony</b> (1)	<b>Bishop</b> (11)	<b>broke</b> (2)	<b>categorization</b> (1)
<b>ballpark</b> (1)	<b>bit</b> (10)	<b>Brooklyn</b> (1)	<b>categorize</b> (4)
<b>bank</b> (4)	<b>blabbing</b> (1)	<b>brother</b> (1)	<b>categorized</b> (2)
<b>bar</b> (4)	<b>black</b> (4)	<b>Brotherhood</b> (1)	<b>caught</b> (2)
<b>Barbara</b> (2)	<b>blank</b> (2)	<b>brought</b> (7)	<b>cause</b> (4)
<b>BARBOUNIS</b> (166)	<b>blanks</b> (1)	<b>bubble</b> (1)	<b>caused</b> (3)
<b>Barbounis's</b> (16)	<b>blended</b> (1)	<b>building</b> (5)	<b>causing</b> (1)
<b>barrister</b> (1)	<b>block</b> (3)	<b>bullet</b> (1)	<b>CAVALIER</b> (49)
<b>bars</b> (7)	<b>Bloom</b> (5)	<b>bus</b> (1)	<b>celebrated</b> (1)
<b>base</b> (2)	<b>blowjob</b> (1)	<b>buses</b> (1)	<b>Center</b> (8)
<b>based</b> (31)	<b>blows</b> (1)	<b>Business</b> (8)	<b>centers</b> (1)
<b>basic</b> (3)	<b>blue</b> (2)	<b>busing</b> (1)	<b>Centre</b> (2)
<b>basically</b> (4)	<b>blueprints</b> (2)	<b>Butler</b> (1)	<b>certain</b> (12)
<b>basis</b> (22)	<b>board</b> (23)	<b>butt</b> (7)	<b>certainly</b> (2)
<b>bastion</b> (1)	<b>boards</b> (3)	<b>buy</b> (4)	<b>CERTIFY</b> (1)
<b>Bates</b> (3)	<b>body</b> (5)	< C >	<b>Chain</b> (2)
<b>bathroom</b> (1)	<b>bomb</b> (1)	<b>Cairo</b> (4)	<b>chairman</b> (5)
<b>bathrooms</b> (2)	<b>bonus</b> (1)	<b>Cairo's</b> (1)	<b>challenge</b> (1)
<b>Battleship</b> (6)	<b>book</b> (1)	<b>Caitriona</b> (18)	<b>chance</b> (2)
<b>Beach</b> (2)	<b>booked</b> (12)	<b>calculate</b> (1)	<b>change</b> (6)
<b>Beaver</b> (1)	<b>bookkeeper</b> (1)	<b>calendar</b> (12)	<b>changed</b> (12)
<b>bedroom</b> (2)	<b>books</b> (5)	<b>calendard</b> (12)	<b>changes</b> (7)
<b>bedrooms</b> (2)	<b>border</b> (1)	<b>California</b> (4)	<b>changing</b> (1)
<b>began</b> (11)	<b>born</b> (3)	<b>call</b> (50)	<b>channels</b> (1)
<b>beginning</b> (8)	<b>boss</b> (11)	<b>CALLED</b> (39)	<b>chanted</b> (1)
<b>behalf</b> (4)	<b>bosses</b> (1)	<b>calling</b> (5)	<b>character</b> (1)
<b>behavior</b> (3)	<b>bought</b> (1)	<b>calls</b> (13)	<b>characterization</b> (8)
<b>beheaded</b> (1)	<b>bouncing</b> (1)	<b>calm</b> (1)	<b>characterizations</b> (1)
<b>beheading</b> (1)	<b>bound</b> (1)	<b>Cambridge</b> (1)	<b>characterize</b> (7)
<b>Belgium</b> (1)	<b>box</b> (1)	<b>CAMERA</b> (1)	<b>characterized</b> (3)
<b>belief</b> (3)	<b>Brady</b> (28)	<b>campaign</b> (2)	<b>Charge</b> (31)
<b>believe</b> (53)	<b>Brady's</b> (8)	<b>camps</b> (1)	<b>charged</b> (2)
<b>believed</b> (1)	<b>brain</b> (1)	<b>campus</b> (1)	<b>charges</b> (4)
<b>believes</b> (1)	<b>breach</b> (3)	<b>Canada</b> (1)	<b>charging</b> (7)
<b>belt</b> (1)	<b>breached</b> (3)	<b>capacity</b> (3)	<b>check</b> (4)
<b>Ben</b> (1)	<b>break</b> (28)	<b>car</b> (3)	<b>cherish</b> (1)
<b>B-e-n</b> (1)	<b>breakdown</b> (1)	<b>care</b> (5)	<b>chess</b> (1)
<b>benefits</b> (1)	<b>breaking</b> (1)	<b>careful</b> (1)	<b>chief</b> (16)
<b>Bennett</b> (32)	<b>breath</b> (3)	<b>Caroline</b> (17)	<b>Chinatown</b> (1)
<b>Bennett's</b> (1)	<b>breathe</b> (1)	<b>Carrie</b> (4)	<b>choose</b> (1)

<b>chose</b> (2)	<b>comment</b> (30)	<b>conference</b> (24)	<b>coordinator</b> (1)
<b>Chronicle</b> (1)	<b>commented</b> (1)	<b>conferences</b> (1)	<b>copied</b> (2)
<b>church</b> (2)	<b>comments</b> (2)	<b>confidential</b> (1)	<b>copy</b> (7)
<b>cigarettes</b> (4)	<b>Commission</b> (3)	<b>confirm</b> (1)	<b>Corbett</b> (1)
<b>circles</b> (1)	<b>committed</b> (1)	<b>conflict</b> (1)	<b>coronavirus</b> (2)
<b>circumstances</b> (2)	<b>committee</b> (14)	<b>conflicts</b> (1)	<b>corporate</b> (4)
<b>citizen</b> (1)	<b>common</b> (4)	<b>confusing</b> (3)	<b>corporation</b> (1)
<b>city</b> (5)	<b>Commonwealth</b> (2)	<b>congress</b> (2)	<b>corps</b> (1)
<b>civic</b> (1)	<b>communicate</b> (1)	<b>Congressman</b> (1)	<b>correct</b> (86)
<b>CIVIL</b> (6)	<b>communicated</b> (5)	<b>congressmen</b> (2)	<b>correcting</b> (1)
<b>civilian</b> (1)	<b>communicating</b> (1)	<b>conjunction</b> (1)	<b>correction</b> (1)
<b>claim</b> (4)	<b>communication</b> (6)	<b>connection</b> (14)	<b>corrective</b> (1)
<b>claiming</b> (1)	<b>communications</b> (18)	<b>connects</b> (1)	<b>correspondence</b> (3)
<b>claims</b> (6)	<b>Community</b> (17)	<b>consider</b> (6)	<b>cost</b> (3)
<b>clarification</b> (1)	<b>companies</b> (1)	<b>considered</b> (2)	<b>Costello</b> (2)
<b>clarify</b> (2)	<b>company</b> (5)	<b>considering</b> (3)	<b>couch</b> (45)
<b>clarity</b> (1)	<b>comparable</b> (1)	<b>consistently</b> (1)	<b>couches</b> (2)
<b>Clark</b> (1)	<b>compare</b> (3)	<b>conspiracy</b> (6)	<b>cough</b> (1)
<b>class</b> (2)	<b>comparison</b> (1)	<b>constant</b> (2)	<b>Council</b> (3)
<b>classes</b> (2)	<b>compartmentalize</b> (1)	<b>constituted</b> (2)	<b>counsel</b> (84)
<b>classification</b> (1)	<b>compartmentalizing</b> (1)	<b>construction</b> (1)	<b>count</b> (3)
<b>clean</b> (4)	<b>competitions</b> (1)	<b>constructively</b> (1)	<b>counterclaim</b> (17)
<b>cleaning</b> (1)	<b>complain</b> (1)	<b>construe</b> (1)	<b>counterclaims</b> (1)
<b>clear</b> (9)	<b>complained</b> (2)	<b>consult</b> (1)	<b>counterterrorism</b> (2)
<b>clearly</b> (1)	<b>complaint</b> (113)	<b>contact</b> (5)	<b>countless</b> (5)
<b>click</b> (3)	<b>complaints</b> (37)	<b>contained</b> (1)	<b>country</b> (3)
<b>client</b> (37)	<b>complete</b> (6)	<b>contempt</b> (2)	<b>County</b> (6)
<b>clients</b> (14)	<b>completely</b> (3)	<b>content</b> (1)	<b>couple</b> (3)
<b>client's</b> (1)	<b>complex</b> (1)	<b>contents</b> (2)	<b>course</b> (8)
<b>Cliff</b> (2)	<b>complicated</b> (6)	<b>context</b> (13)	<b>COURT</b> (93)
<b>clock</b> (1)	<b>compound</b> (4)	<b>contingency</b> (5)	<b>courthouse</b> (1)
<b>close</b> (1)	<b>comprehension</b> (1)	<b>continuation</b> (2)	<b>courtroom</b> (1)
<b>clue</b> (1)	<b>compromising</b> (2)	<b>continue</b> (13)	<b>cover</b> (2)
<b>codified</b> (1)	<b>Computer</b> (7)	<b>continued</b> (1)	<b>covered</b> (2)
<b>codirectorship</b> (1)	<b>conceived</b> (1)	<b>continues</b> (2)	<b>covering</b> (2)
<b>coffee</b> (1)	<b>concept</b> (2)	<b>continuing</b> (2)	<b>covers</b> (1)
<b>coincidence</b> (1)	<b>concerned</b> (2)	<b>continuous</b> (1)	<b>coworker</b> (12)
<b>cold</b> (2)	<b>concerted</b> (1)	<b>contract</b> (8)	<b>coworkers</b> (1)
<b>colleagues</b> (2)	<b>conclude</b> (1)	<b>contractors</b> (1)	<b>COZEN</b> (3)
<b>collect</b> (1)	<b>concluded</b> (1)	<b>contractual</b> (1)	<b>crazy</b> (5)
<b>collection</b> (1)	<b>concluding</b> (1)	<b>control</b> (2)	<b>created</b> (1)
<b>college</b> (5)	<b>conclusion</b> (14)	<b>controlled</b> (1)	<b>creating</b> (1)
<b>combination</b> (1)	<b>concocted</b> (6)	<b>conversation</b> (73)	<b>credibility</b> (1)
<b>combined</b> (2)	<b>concocting</b> (1)	<b>conversations</b> (37)	<b>credible</b> (11)
<b>come</b> (18)	<b>condition</b> (3)	<b>conversion</b> (2)	<b>credits</b> (1)
<b>comes</b> (3)	<b>conditions</b> (1)	<b>converted</b> (1)	<b>crew</b> (1)
<b>coming</b> (6)	<b>condo</b> (1)	<b>conveyed</b> (6)	<b>criminal</b> (1)
<b>commander</b> (1)	<b>conduct</b> (27)	<b>convicted</b> (1)	<b>criminals</b> (2)
<b>commanders</b> (1)		<b>co-opting</b> (1)	<b>criticize</b> (1)

<b>cross</b> (1)	<b>December</b> (12)	<b>desk</b> (2)	<b>Discrimination</b> (18)
<b>cruise</b> (1)	<b>decibel</b> (1)	<b>desks</b> (1)	<b>discuss</b> (3)
<b>Cuba</b> (1)	<b>decide</b> (1)	<b>despair</b> (1)	<b>discussed</b> (8)
<b>culminated</b> (2)	<b>decided</b> (2)	<b>destroy</b> (1)	<b>discussing</b> (5)
<b>cup</b> (1)	<b>decision</b> (3)	<b>destroying</b> (1)	<b>discussion</b> (14)
<b>curious</b> (1)	<b>decisions</b> (2)	<b>destruction</b> (1)	<b>discussions</b> (5)
<b>current</b> (1)	<b>deconstructed</b> (1)	<b>detail</b> (2)	<b>dishonesty</b> (2)
<b>curtain</b> (1)	<b>deep</b> (2)	<b>detective</b> (1)	<b>dismissal</b> (1)
<b>custodian</b> (1)	<b>Defence</b> (1)	<b>determined</b> (1)	<b>dismissed</b> (2)
<b>custody</b> (1)	<b>defendant</b> (2)	<b>determining</b> (1)	<b>disparities</b> (1)
<b>cut</b> (3)	<b>Defendants</b> (2)	<b>detrimental</b> (1)	<b>disparity</b> (1)
<b>Cynwyd</b> (1)	<b>defending</b> (1)	<b>develop</b> (1)	<b>disproven</b> (1)
	<b>Defense</b> (4)	<b>development</b> (2)	<b>dispute</b> (4)
<b>&lt; D &gt;</b>	<b>defer</b> (2)	<b>device</b> (1)	<b>disqualification</b> (1)
<b>D.C</b> (8)	<b>defined</b> (2)	<b>devices</b> (2)	<b>disqualified</b> (1)
<b>D.C.</b> (1)	<b>definitely</b> (4)	<b>diagram</b> (6)	<b>disqualify</b> (3)
<b>da</b> (5)	<b>definition</b> (6)	<b>dialogue</b> (1)	<b>dissonance</b> (1)
<b>damage</b> (3)	<b>defraud</b> (3)	<b>diametric</b> (1)	<b>distinction</b> (1)
<b>damages</b> (13)	<b>defrauded</b> (6)	<b>die</b> (1)	<b>DISTRICT</b> (11)
<b>Dan</b> (1)	<b>defrauding</b> (4)	<b>died</b> (1)	<b>districts</b> (1)
<b>Daniel</b> (107)	<b>defrauds</b> (1)	<b>difference</b> (7)	<b>diversity</b> (4)
<b>Daniel's</b> (1)	<b>degree</b> (6)	<b>different</b> (65)	<b>divided</b> (2)
<b>Danny</b> (44)	<b>Delaney</b> (6)	<b>differently</b> (1)	<b>docket</b> (2)
<b>dannythomas@tesco.co</b>	<b>delivered</b> (1)	<b>difficult</b> (14)	<b>docs</b> (3)
<b>.uk</b> (1)	<b>delusions</b> (1)	<b>difficulties</b> (2)	<b>doctor</b> (1)
<b>Darren</b> (1)	<b>demand</b> (1)	<b>dignity</b> (2)	<b>doctrine</b> (2)
<b>Dashti</b> (3)	<b>demanding</b> (2)	<b>dining</b> (2)	<b>Document</b> (73)
<b>D-a-s-h-t-i</b> (1)	<b>demise</b> (1)	<b>dinner</b> (14)	<b>documentation</b> (2)
<b>data</b> (2)	<b>demoted</b> (1)	<b>direct</b> (16)	<b>documents</b> (51)
<b>database</b> (1)	<b>denial</b> (2)	<b>directed</b> (4)	<b>doing</b> (32)
<b>date</b> (41)	<b>deny</b> (6)	<b>directing</b> (2)	<b>dollar</b> (5)
<b>dated</b> (1)	<b>dep</b> (1)	<b>direction</b> (2)	<b>dollars</b> (9)
<b>dates</b> (5)	<b>department</b> (1)	<b>directive</b> (1)	<b>Dolly</b> (1)
<b>daughter</b> (1)	<b>departure</b> (3)	<b>directly</b> (9)	<b>domestic</b> (2)
<b>Dave</b> (3)	<b>depending</b> (2)	<b>director</b> (42)	<b>Donald</b> (1)
<b>Davitch</b> (1)	<b>depends</b> (8)	<b>directors</b> (4)	<b>donate</b> (4)
<b>day</b> (24)	<b>deployment</b> (1)	<b>disagree</b> (9)	<b>donates</b> (1)
<b>days</b> (12)	<b>Deponent</b> (3)	<b>disagreed</b> (1)	<b>donation</b> (1)
<b>de</b> (2)	<b>depose</b> (1)	<b>disagreement</b> (1)	<b>donations</b> (1)
<b>dead</b> (1)	<b>deposing</b> (1)	<b>discharged</b> (1)	<b>donor</b> (3)
<b>deal</b> (6)	<b>deposition</b> (39)	<b>disciplinary</b> (1)	<b>donors</b> (2)
<b>dealing</b> (5)	<b>deputy</b> (16)	<b>disclosures</b> (2)	<b>download</b> (3)
<b>deals</b> (3)	<b>DEREK</b> (25)	<b>disconnected</b> (1)	<b>downloaded</b> (1)
<b>dealt</b> (5)	<b>descendents</b> (1)	<b>discontent</b> (7)	<b>downstairs</b> (1)
<b>dear</b> (1)	<b>describe</b> (9)	<b>discover</b> (2)	<b>downward</b> (1)
<b>debate</b> (1)	<b>described</b> (6)	<b>discovered</b> (1)	<b>dozens</b> (4)
<b>debilitated</b> (1)	<b>description</b> (7)	<b>discovery</b> (16)	<b>Dr</b> (19)
<b>deceive</b> (1)	<b>design</b> (1)	<b>discriminated</b> (2)	<b>draft</b> (6)
<b>deceived</b> (1)	<b>designed</b> (1)	<b>discriminating</b> (2)	<b>drafted</b> (2)



<b>drafting</b> (5)	<b>either</b> (21)	<b>E-r-i-c</b> (1)	<b>explains</b> (1)
<b>Dragonetti</b> (1)	<b>EJ</b> (4)	<b>Erica</b> (1)	<b>explanation</b> (3)
<b>dress</b> (1)	<b>elderly</b> (1)	<b>Erie</b> (1)	<b>Exponent</b> (1)
<b>drill</b> (1)	<b>elected</b> (1)	<b>escape</b> (1)	<b>extended</b> (1)
<b>drink</b> (1)	<b>electronic</b> (7)	<b>escaping</b> (1)	<b>extensive</b> (2)
<b>drinking</b> (1)	<b>electronically</b> (1)	<b>especially</b> (2)	<b>extent</b> (6)
<b>drinks</b> (3)	<b>element</b> (2)	<b>ESQ</b> (4)	<b>external</b> (6)
<b>drive</b> (1)	<b>elementary</b> (1)	<b>established</b> (2)	<b>extra</b> (1)
<b>drop</b> (1)	<b>eleventh</b> (1)	<b>estimate</b> (2)	<b>eye</b> (1)
<b>drove</b> (1)	<b>Elliot</b> (4)	<b>et</b> (2)	< F >
<b>drug</b> (2)	<b>E-mail</b> (62)	<b>ethics</b> (1)	<b>fabricate</b> (2)
<b>drum</b> (1)	<b>e-mailed</b> (1)	<b>Europe</b> (3)	<b>fabricated</b> (3)
<b>drunk</b> (3)	<b>e-mails</b> (15)	<b>evening</b> (11)	<b>face</b> (3)
<b>dual</b> (2)	<b>Eman</b> (4)	<b>event</b> (9)	<b>Facebook</b> (2)
<b>due</b> (2)	<b>embarrass</b> (1)	<b>events</b> (9)	<b>facilitate</b> (3)
<b>DULY</b> (1)	<b>embassy</b> (2)	<b>eventual</b> (1)	<b>facilitated</b> (2)
<b>duped</b> (1)	<b>employed</b> (6)	<b>eventually</b> (5)	<b>fact</b> (13)
<b>duty</b> (5)	<b>employee</b> (21)	<b>Everest</b> (3)	<b>facts</b> (6)
<b>dynamics</b> (1)	<b>employees</b> (21)	<b>Everybody</b> (2)	<b>factual</b> (14)
< E >	<b>employee's</b> (1)	<b>everybody's</b> (1)	<b>failed</b> (2)
<b>Eagles</b> (2)	<b>employer's</b> (1)	<b>evidence</b> (21)	<b>fair</b> (32)
<b>ear</b> (7)	<b>employment</b> (11)	<b>exact</b> (20)	<b>Fairless</b> (1)
<b>earlier</b> (7)	<b>enacted</b> (1)	<b>exactly</b> (12)	<b>fall</b> (2)
<b>early</b> (4)	<b>encounters</b> (1)	<b>exaggerating</b> (1)	<b>false</b> (17)
<b>ears</b> (1)	<b>ended</b> (4)	<b>Examination</b> (3)	<b>familiar</b> (4)
<b>Earth</b> (1)	<b>ends</b> (3)	<b>EXAMINED</b> (3)	<b>far</b> (5)
<b>easier</b> (2)	<b>engage</b> (1)	<b>example</b> (8)	<b>Faragher-Ellerth</b> (1)
<b>EAST</b> (122)	<b>engaged</b> (4)	<b>examples</b> (2)	<b>fashion</b> (1)
<b>EASTERN</b> (22)	<b>engaging</b> (2)	<b>exception</b> (1)	<b>fast</b> (3)
<b>easy</b> (2)	<b>engineered</b> (2)	<b>exchange</b> (1)	<b>father</b> (2)
<b>eat</b> (1)	<b>England</b> (1)	<b>exchanges</b> (1)	<b>February</b> (5)
<b>ECF</b> (5)	<b>English</b> (1)	<b>exchanging</b> (1)	<b>federated</b> (1)
<b>economic</b> (1)	<b>engrossed</b> (1)	<b>excited</b> (2)	<b>Federation</b> (7)
<b>e-discovery</b> (2)	<b>enlighten</b> (1)	<b>exclusively</b> (1)	<b>feedback</b> (1)
<b>editor</b> (3)	<b>enlightening</b> (1)	<b>excuse</b> (15)	<b>Feel</b> (3)
<b>editor-in-chief</b> (1)	<b>enlistment</b> (1)	<b>executive</b> (23)	<b>feelings</b> (1)
<b>edits</b> (1)	<b>entered</b> (2)	<b>exempt</b> (3)	<b>fees</b> (1)
<b>education</b> (7)	<b>entering</b> (1)	<b>exhaustive</b> (2)	<b>fell</b> (1)
<b>educational</b> (6)	<b>enterprise</b> (4)	<b>exhibit</b> (15)	<b>fellow</b> (1)
<b>EEO</b> (1)	<b>entire</b> (14)	<b>EXHIBITS</b> (4)	<b>felt</b> (7)
<b>EEOC</b> (31)	<b>entirety</b> (4)	<b>exist</b> (5)	<b>female</b> (12)
<b>effect</b> (3)	<b>entrance</b> (1)	<b>exists</b> (3)	<b>fiduciary</b> (1)
<b>Effective</b> (1)	<b>entry</b> (1)	<b>expect</b> (1)	<b>field</b> (3)
<b>efficacy</b> (1)	<b>enumerated</b> (1)	<b>expected</b> (1)	<b>fifth</b> (3)
<b>effort</b> (2)	<b>Equal</b> (1)	<b>experience</b> (3)	<b>fight</b> (2)
<b>Egypt</b> (1)	<b>equality</b> (1)	<b>experiences</b> (1)	<b>figure</b> (2)
<b>Egyptian</b> (2)	<b>equated</b> (1)	<b>expert</b> (5)	<b>file</b> (18)
<b>eight</b> (12)	<b>equity</b> (1)	<b>explain</b> (26)	<b>filed</b> (52)
	<b>Eric</b> (1)	<b>explained</b> (3)	

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 future (3)

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 Galilee (1)  
 Gallery (1)  
 Gambill (1)  
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 Gavriel (1)  
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 groundwork (3)  
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 Haifa (4)  
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 Halevi (1)  
 H-a-l-e-v-i (1)  
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 Harrisburg (1)  
 Harrison (1)  
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 Hatzalah (1)  
 Hawaii (6)  
 head (4)  
 health (2)  
 hear (63)  
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 hearsay (1)  
 Hebrew (2)

<b>Heights</b> (1)	<b>Huh</b> (1)	<b>incorrectly</b> (1)	<b>Interim</b> (1)
<b>held</b> (16)	<b>Human</b> (4)	<b>incredibly</b> (1)	<b>intern</b> (2)
<b>hell</b> (1)	<b>Hun</b> (1)	<b>incrementally</b> (1)	<b>internal</b> (1)
<b>he'll</b> (2)	<b>H-u-n</b> (1)	<b>incubator</b> (1)	<b>internally</b> (1)
<b>hello</b> (1)	<b>hundred</b> (12)	<b>INDEX</b> (2)	<b>international</b> (2)
<b>help</b> (23)	<b>hundreds</b> (2)	<b>indicate</b> (3)	<b>internationally</b> (1)
<b>helped</b> (3)	<b>Hunter</b> (2)	<b>indicates</b> (1)	<b>Interns</b> (1)
<b>helping</b> (3)	<b>hurricane</b> (1)	<b>indiscernible</b> (4)	<b>interpersonal</b> (2)
<b>helps</b> (2)	<b>hurt</b> (1)	<b>individual</b> (10)	<b>interpret</b> (1)
<b>Herzliya</b> (2)	<b>husband</b> (6)	<b>individuals</b> (10)	<b>interpretation</b> (5)
<b>H-e-r-z-l-i-y-a</b> (1)	<b>HVRSD</b> (1)	<b>inebriated</b> (1)	<b>interrogatory</b> (1)
<b>hey</b> (6)	<b>Hybros</b> (1)	<b>inflicted</b> (1)	<b>interrupted</b> (2)
<b>Hezbollah</b> (2)	<b>H-y-b-r-o-s</b> (1)	<b>informal</b> (2)	<b>interrupting</b> (8)
<b>HH</b> (1)	<b>hypothetical</b> (5)	<b>information</b> (25)	<b>intersected</b> (1)
<b>hierarchy</b> (4)	<b>&lt; I &gt;</b>	<b>informed</b> (2)	<b>intersecting</b> (1)
<b>High</b> (8)	<b>Ichud</b> (1)	<b>in-house</b> (9)	<b>interview</b> (2)
<b>higher</b> (1)	<b>IDC</b> (2)	<b>initial</b> (4)	<b>interviews</b> (1)
<b>highest</b> (3)	<b>idea</b> (2)	<b>initiated</b> (6)	<b>intimacy</b> (2)
<b>highlighted</b> (3)	<b>Identify</b> (2)	<b>initiation</b> (1)	<b>intimate</b> (2)
<b>Hillel</b> (3)	<b>identifying</b> (1)	<b>initiatives</b> (4)	<b>intimately</b> (2)
<b>Hills</b> (1)	<b>IDF</b> (1)	<b>innuendo</b> (1)	<b>intimidated</b> (1)
<b>Hilton</b> (1)	<b>ill</b> (4)	<b>in-person</b> (2)	<b>intricate</b> (1)
<b>hire</b> (4)	<b>illegal</b> (1)	<b>insofar</b> (1)	<b>introduced</b> (3)
<b>hired</b> (5)	<b>imagine</b> (1)	<b>instance</b> (12)	<b>investigated</b> (4)
<b>hiring</b> (2)	<b>imbroglio</b> (1)	<b>instances</b> (3)	<b>investigating</b> (2)
<b>history</b> (4)	<b>immediately</b> (4)	<b>instant</b> (1)	<b>investigation</b> (16)
<b>hit</b> (1)	<b>impacted</b> (1)	<b>instruct</b> (2)	<b>investigative</b> (1)
<b>hits</b> (1)	<b>implication</b> (1)	<b>instructed</b> (3)	<b>invitation</b> (1)
<b>hold</b> (26)	<b>implies</b> (1)	<b>instructing</b> (1)	<b>invite</b> (2)
<b>holding</b> (1)	<b>importance</b> (2)	<b>instruction</b> (3)	<b>invited</b> (9)
<b>Hollin</b> (1)	<b>important</b> (6)	<b>instructions</b> (2)	<b>invoke</b> (5)
<b>home</b> (1)	<b>impossible</b> (2)	<b>insult</b> (1)	<b>involve</b> (1)
<b>honest</b> (2)	<b>improper</b> (3)	<b>insurance</b> (1)	<b>involved</b> (32)
<b>honesty</b> (2)	<b>improve</b> (1)	<b>intelligence</b> (1)	<b>involvement</b> (6)
<b>honor</b> (1)	<b>improvement</b> (3)	<b>intense</b> (1)	<b>involving</b> (4)
<b>honorific</b> (1)	<b>inaccurate</b> (3)	<b>intensive</b> (1)	<b>Iran</b> (2)
<b>hope</b> (2)	<b>inappropriate</b> (10)	<b>intent</b> (1)	<b>ISIS</b> (2)
<b>Hopewell</b> (2)	<b>inappropriately</b> (1)	<b>intention</b> (5)	<b>Islamic</b> (1)
<b>horrible</b> (1)	<b>incident</b> (14)	<b>intentions</b> (9)	<b>isolate</b> (1)
<b>host</b> (1)	<b>incidents</b> (1)	<b>interaction</b> (1)	<b>Israel</b> (39)
<b>hostage</b> (1)	<b>include</b> (6)	<b>interactions</b> (2)	<b>Israeli</b> (6)
<b>hosts</b> (1)	<b>included</b> (6)	<b>intercourse</b> (1)	<b>Israel's</b> (4)
<b>hotel</b> (19)	<b>includes</b> (2)	<b>Interdisciplinary</b> (1)	<b>issue</b> (3)
<b>hotels</b> (2)	<b>including</b> (10)	<b>interest</b> (8)	<b>issues</b> (14)
<b>hour</b> (1)	<b>inclusion</b> (3)	<b>interested</b> (1)	<b>Italy</b> (5)
<b>hours</b> (9)	<b>inclusive</b> (3)	<b>interesting</b> (3)	<b>items</b> (2)
<b>house</b> (2)	<b>inconclusive</b> (1)	<b>interests</b> (3)	<b>its</b> (2)
<b>hover</b> (2)	<b>incorrect</b> (11)	<b>interface</b> (1)	<b>IVP</b> (1)
<b>huge</b> (1)		<b>interfering</b> (1)	

## &lt; J &gt;

jail (3)  
 James (1)  
 Jamie (1)  
 January (7)  
 Jazmin (10)  
 jcavalier@cozen.com  
 (1)  
 JCRC (14)  
 j-e-l (1)  
 Jersey (5)  
 Jerusalem (2)  
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 Jews (1)  
 job (20)  
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 joint (1)  
 Jon (6)  
 JONATHAN (3)  
 Jordan (1)  
 Joshua (1)  
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 Judaic (1)  
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 July (8)  
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 June (36)  
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 jury (1)  
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## &lt; K &gt;

Kalina (4)  
 Karmiel (1)  
 K-a-r-m-i-e-l (1)  
 Kassam (12)  
 Katz (2)  
 Katzen (1)  
 Kaufman (2)  
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**New** (9)  
**Newport** (1)  
**news** (4)  
**nice** (3)  
**nicer** (2)  
**Nick** (1)  
**night** (15)  
**nighttime** (1)  
**Nile** (1)  
**nine** (4)  
**ninth** (4)  
**Nir** (2)  
**N-i-r** (1)  
**Nitzan** (1)  
**N-i-t-z-a-n** (1)  
**NJISAA** (1)

**nod** (1)  
**nonannouncement** (1)  
**nonissue** (1)  
**nonlegal** (3)  
**nonprofit** (1)  
**nonresponsive** (1)  
**nonsexual** (2)  
**north** (1)  
**northeast** (1)  
**Notary** (2)  
**note** (4)  
**noted** (1)  
**notes** (5)  
**notice** (3)  
**notified** (1)  
**notify** (2)  
**November** (115)  
**NUMBER** (39)  
**numbered** (1)

## &lt; O &gt;

**oath** (9)  
**Obama** (1)  
**OBIDs** (1)  
**object** (19)  
**objecting** (7)  
**Objection** (11)  
**obligation** (1)  
**obligations** (1)  
**O'Brien** (4)  
**observed** (1)  
**obstruct** (1)  
**obtain** (1)  
**obtained** (2)  
**obvious** (1)  
**obviously** (2)  
**occasion** (1)  
**occasions** (2)  
**occurred** (7)  
**occurs** (1)  
**O'CONNOR** (3)  
**October** (41)  
**offensive** (1)  
**offer** (9)  
**offered** (3)  
**offering** (2)  
**off-hours** (1)  
**office** (26)  
**officer** (4)

**officers** (3)  
**offices** (1)  
**official** (1)  
**officiate** (1)  
**Oh** (7)  
**Ohio** (1)  
**Okay** (292)  
**old** (1)  
**once** (12)  
**one-on-one** (2)  
**ones** (5)  
**online** (2)  
**open** (2)  
**Operation** (1)  
**operational** (1)  
**operations** (1)  
**opinion** (8)  
**opportunity** (15)  
**opposite** (1)  
**opposition** (1)  
**oppress** (1)  
**option** (1)  
**oral** (1)  
**order** (7)  
**ordered** (1)  
**Ordinance** (1)  
**organization** (54)  
**organizations** (3)  
**organization's** (2)  
**organize** (2)  
**organized** (3)  
**organizer** (1)  
**original** (3)  
**originally** (8)  
**outlandish** (1)  
**outline** (2)  
**outrageous** (1)  
**outreach** (1)  
**outset** (2)  
**outside** (7)  
**outstanding** (1)  
**oval** (1)  
**overnight** (1)  
**overseas** (3)  
**oversee** (1)  
**overseeing** (1)  
**owes** (2)  
**Oxford** (1)

## &lt; P &gt;

**P.C** (1)  
**p.m** (24)  
**PA** (5)  
**PACER** (5)  
**pack** (2)  
**PAGE** (2)  
**pages** (1)  
**paid** (10)  
**Paige** (1)  
**pain** (1)  
**pale** (1)  
**Palestine** (1)  
**Palestinian** (2)  
**paper** (1)  
**paragraph** (13)  
**Paragraphs** (2)  
**paralegal** (2)  
**parallel** (3)  
**paraphrasing** (1)  
**parentheses** (1)  
**Paris** (2)  
**parliament** (2)  
**part** (40)  
**partial** (4)  
**participants** (3)  
**participated** (4)  
**participating** (1)  
**participation** (1)  
**parties** (3)  
**partnership** (1)  
**Parton** (1)  
**parts** (3)  
**part's** (1)  
**party** (8)  
**party's** (1)  
**Passover** (1)  
**passport** (1)  
**paste** (1)  
**pasted** (1)  
**Patel** (4)  
**path** (1)  
**Patricia** (35)  
**Patriots** (2)  
**pattern** (3)  
**Paul** (1)  
**pay** (16)  
**PayPal** (1)  
**PDF** (3)

**Peduto** (1)  
**pending** (17)  
**penis** (3)  
**Pennsbury** (2)  
**Pennsylvania** (16)  
**people** (78)  
**people's** (5)  
**percent** (12)  
**period** (5)  
**perjures** (1)  
**perjuring** (1)  
**perjury** (6)  
**permission** (1)  
**permitted** (1)  
**Perry** (2)  
**person** (34)  
**personal** (14)  
**personally** (2)  
**personnel** (6)  
**perspective** (1)  
**pertaining** (1)  
**perturbed** (1)  
**ph** (7)  
**Philadelphia** (23)  
**Philadelphia's** (1)  
**Philly** (2)  
**phone** (19)  
**photo** (1)  
**Photograph** (1)  
**phrase** (1)  
**physical** (3)  
**physically** (1)  
**physics** (2)  
**pick** (1)  
**picked** (1)  
**picking** (1)  
**picture** (2)  
**pictures** (2)  
**piece** (7)  
**pieces** (1)  
**pin** (1)  
**Pincus** (1)  
**Pinsker** (4)  
**Pinus** (1)  
**Pipes** (192)  
**Pipes's** (4)  
**Pittsburgh** (23)  
**pizza** (4)  
**Place** (66)

<b>placed</b> (1)	<b>pre-discovery</b> (1)	<b>profess</b> (1)	<b>Qatari</b> (1)
<b>placement</b> (1)	<b>prefers</b> (1)	<b>profession</b> (1)	<b>quarterback</b> (3)
<b>places</b> (1)	<b>premier</b> (1)	<b>Professional</b> (15)	<b>Quarterly</b> (4)
<b>Plaintiff</b> (4)	<b>prep</b> (1)	<b>professionals</b> (1)	<b>quasi-governmental</b> (1)
<b>plan</b> (6)	<b>preparation</b> (2)	<b>program</b> (3)	<b>question</b> (283)
<b>plane</b> (2)	<b>prepare</b> (1)	<b>programs</b> (2)	<b>question-answer</b> (2)
<b>planet</b> (3)	<b>prepared</b> (1)	<b>progression</b> (1)	<b>questioned</b> (1)
<b>planned</b> (1)	<b>preparing</b> (1)	<b>project</b> (4)	<b>questioning</b> (3)
<b>planning</b> (5)	<b>presence</b> (10)	<b>projects</b> (8)	<b>questions</b> (29)
<b>plans</b> (2)	<b>Present</b> (11)	<b>promise</b> (3)	<b>quick</b> (3)
<b>play</b> (5)	<b>presentation</b> (1)	<b>promote</b> (1)	<b>quickest</b> (1)
<b>played</b> (8)	<b>preserving</b> (1)	<b>promoted</b> (7)	<b>quickly</b> (4)
<b>playing</b> (5)	<b>preside</b> (2)	<b>promotion</b> (1)	<b>quieting</b> (3)
<b>pleasantries</b> (1)	<b>presided</b> (2)	<b>pronounce</b> (2)	<b>quit</b> (3)
<b>please</b> (61)	<b>president</b> (6)	<b>proof</b> (2)	<b>quite</b> (4)
<b>plethora</b> (2)	<b>pretend</b> (1)	<b>proper</b> (5)	<b>quotation</b> (2)
<b>PLLC</b> (1)	<b>pretty</b> (6)	<b>properties</b> (1)	<b>quote</b> (5)
<b>plus</b> (6)	<b>prevent</b> (1)	<b>protected</b> (2)	<b>quoted</b> (1)
<b>point</b> (12)	<b>previous</b> (6)	<b>protection</b> (1)	<b>quotes</b> (5)
<b>points</b> (1)	<b>previously</b> (3)	<b>protestant</b> (1)	<b>quoting</b> (5)
<b>police</b> (2)	<b>primarily</b> (1)	<b>protocols</b> (3)	
<b>policies</b> (3)	<b>Princeton</b> (1)	<b>proud</b> (1)	<b>&lt; R &gt;</b>
<b>policy</b> (16)	<b>printed</b> (1)	<b>prove</b> (5)	<b>racial</b> (1)
<b>political</b> (2)	<b>printout</b> (1)	<b>proven</b> (2)	<b>radio</b> (1)
<b>Politici</b> (1)	<b>prior</b> (14)	<b>proves</b> (3)	<b>Raheem</b> (17)
<b>politics</b> (1)	<b>prison</b> (3)	<b>provide</b> (14)	<b>raise</b> (9)
<b>population</b> (1)	<b>privacy</b> (3)	<b>provided</b> (24)	<b>raised</b> (5)
<b>portfolios</b> (1)	<b>private</b> (5)	<b>providing</b> (6)	<b>rally</b> (24)
<b>portion</b> (1)	<b>privilege</b> (13)	<b>psychiatrist</b> (1)	<b>ran</b> (2)
<b>position</b> (48)	<b>privileged</b> (17)	<b>Public</b> (12)	<b>range</b> (2)
<b>positioning</b> (1)	<b>privy</b> (2)	<b>publisher</b> (1)	<b>Raquel</b> (1)
<b>positions</b> (6)	<b>probably</b> (42)	<b>Puerto</b> (1)	<b>rate</b> (4)
<b>positive</b> (1)	<b>problem</b> (4)	<b>pull</b> (5)	<b>reached</b> (1)
<b>possession</b> (4)	<b>problematic</b> (1)	<b>pulled</b> (2)	<b>reacted</b> (1)
<b>possible</b> (13)	<b>problems</b> (2)	<b>pulling</b> (2)	<b>read</b> (43)
<b>post</b> (1)	<b>procedure</b> (1)	<b>punitive</b> (1)	<b>reading</b> (9)
<b>Post-Gazette</b> (1)	<b>procedures</b> (4)	<b>purely</b> (1)	<b>ready</b> (1)
<b>Potemkin</b> (1)	<b>proceeded</b> (2)	<b>purity</b> (2)	<b>real</b> (3)
<b>potential</b> (1)	<b>proceeding</b> (1)	<b>purple</b> (1)	<b>realize</b> (2)
<b>pound</b> (3)	<b>proceedings</b> (4)	<b>pursuant</b> (3)	<b>really</b> (41)
<b>pounds</b> (16)	<b>process</b> (7)	<b>pursue</b> (1)	<b>reason</b> (24)
<b>Power</b> (2)	<b>procession</b> (1)	<b>pursuing</b> (1)	<b>reasonable</b> (2)
<b>Practice</b> (1)	<b>processions</b> (1)	<b>push</b> (1)	<b>reasons</b> (16)
<b>practices</b> (2)	<b>produce</b> (5)	<b>put</b> (61)	<b>recall</b> (35)
<b>precautions</b> (2)	<b>produced</b> (7)	<b>Putin</b> (1)	<b>recategorize</b> (1)
<b>precipice</b> (1)	<b>producing</b> (1)	<b>putting</b> (5)	<b>receipt</b> (2)
<b>predates</b> (1)	<b>product</b> (1)		<b>receipts</b> (12)
<b>predicate</b> (13)	<b>production</b> (2)	<b>&lt; Q &gt;</b>	<b>receive</b> (7)
<b>predicated</b> (1)	<b>productive</b> (1)	<b>Qaeda</b> (1)	

received (31)	Relations (5)	required (1)	RIESER (5)
receiving (5)	relationship (9)	requires (1)	Right (232)
recess (6)	relationships (4)	rescue (2)	Rishon (1)
recollect (1)	relative (1)	research (1)	R-i-s-h-o-n (1)
recollecting (1)	relatively (1)	reservations (1)	risk (2)
recollection (9)	Relativity (2)	reserve (1)	River (1)
recommendation (4)	release (2)	Reserves (2)	Robert (1)
recommendations (1)	released (1)	reset (1)	Robinson (21)
recommended (3)	relegate (3)	resignation (1)	rogue (1)
record (117)	relegated (3)	resisted (1)	role (6)
recorded (5)	relevance (2)	resource (1)	roles (3)
recording (12)	relevant (5)	resources (1)	roll (1)
recordings (2)	reliable (1)	respect (5)	rolling (2)
records (11)	relief (2)	respond (8)	ROMAN (170)
recover (1)	relies (1)	responded (1)	R-o-m-a-n (2)
recruiters (1)	rely (1)	respondent (11)	Romano (2)
redirect (1)	remain (1)	responding (1)	Roman's (3)
reeling (2)	remained (1)	responds (1)	room (48)
refer (13)	remember (107)	response (9)	rooms (4)
reference (3)	remembers (1)	responsibilities (44)	Rose (1)
referenced (1)	remit (1)	responsibility (18)	Rosie (4)
references (1)	remote (1)	responsible (9)	rotting (1)
referencing (1)	remotely (1)	rest (4)	roundtable (1)
referred (2)	removed (11)	restaurant (1)	rub (3)
referring (21)	reneged (1)	restrictions (3)	ruin (2)
refers (5)	rent (1)	restroom (2)	ruined (10)
reflect (1)	renumeration (1)	result (9)	Rule (2)
reflected (2)	repeat (10)	resulted (1)	rules (2)
reflects (2)	rephrase (8)	results (6)	rumor (9)
refresh (2)	replete (2)	resumed (1)	rumors (1)
refugee (3)	reply (2)	retaining (1)	run (1)
refugees (2)	report (11)	retaliate (2)	runs (1)
refusing (2)	reported (9)	retaliated (1)	Ryan (3)
regard (3)	Reporter (75)	retaliation (22)	
regarding (18)	Reporting (4)	retired (1)	< S >
regardless (1)	reports (3)	retiring (1)	sabotage (1)
regards (1)	reprehensible (1)	return (3)	salary (2)
Regional (2)	represent (11)	returned (2)	sanctioned (1)
Registered (6)	representation (15)	revealed (2)	Saraswati (1)
regular (1)	representations (4)	revealing (1)	sat (6)
rehired (1)	representative (1)	review (29)	Saturday (2)
reimbursed (1)	representatives (1)	reviewed (23)	save (2)
reimbursement (1)	represented (12)	reviewing (2)	saved (1)
reiterate (1)	representing (7)	Reya (1)	saw (17)
relate (3)	reproductive (1)	Reynolds (2)	saying (111)
related (25)	Republic (1)	Rich (1)	says (71)
relates (17)	request (4)	Rico (2)	scenario (1)
Relating (1)	requested (1)	rides (1)	schedule (2)
relation (1)	requesting (1)	ridiculous (3)	scheme (1)



<b>School</b> (24)	<b>sending</b> (4)	<b>shot</b> (2)	<b>so-called</b> (1)
<b>schools</b> (1)	<b>sends</b> (1)	<b>shots</b> (1)	<b>social</b> (6)
<b>Schuyler</b> (1)	<b>senior</b> (3)	<b>show</b> (19)	<b>solicitor</b> (1)
<b>Sciott</b> (3)	<b>sense</b> (2)	<b>showed</b> (8)	<b>somebody</b> (8)
<b>S-c-i-o-t-t</b> (2)	<b>sent</b> (41)	<b>showing</b> (4)	<b>someone's</b> (2)
<b>scope</b> (2)	<b>sentence</b> (19)	<b>shows</b> (2)	<b>somewhat</b> (2)
<b>Scorpion</b> (1)	<b>separate</b> (4)	<b>shroud</b> (2)	<b>son</b> (1)
<b>Scottish</b> (1)	<b>separated</b> (1)	<b>Si</b> (2)	<b>soon</b> (3)
<b>scratch</b> (1)	<b>September</b> (11)	<b>S-i</b> (1)	<b>sorrow</b> (1)
<b>scream</b> (1)	<b>sergeant</b> (1)	<b>Sid</b> (1)	<b>Sorry</b> (42)
<b>screen</b> (17)	<b>series</b> (2)	<b>side</b> (12)	<b>sort</b> (22)
<b>screened</b> (1)	<b>serious</b> (1)	<b>sides</b> (1)	<b>Sotloff</b> (1)
<b>screwed</b> (1)	<b>seriously</b> (6)	<b>Sidkoff</b> (2)	<b>sought</b> (2)
<b>scroll</b> (3)	<b>server</b> (1)	<b>SIDNEY</b> (5)	<b>sound</b> (7)
<b>Sderot</b> (1)	<b>service</b> (1)	<b>sigh</b> (1)	<b>sounds</b> (2)
<b>S-d-e-r-o-t</b> (1)	<b>serviceman</b> (1)	<b>sign</b> (1)	<b>sources</b> (1)
<b>se</b> (1)	<b>sessions</b> (2)	<b>signature</b> (3)	<b>south</b> (1)
<b>Sea</b> (1)	<b>set</b> (3)	<b>signed</b> (3)	<b>space</b> (9)
<b>seal</b> (3)	<b>SETH</b> (6)	<b>signpost</b> (1)	<b>speak</b> (10)
<b>sealed</b> (2)	<b>seth@dereksmithlaw.c</b>	<b>silence</b> (2)	<b>speakerphone</b> (1)
<b>Seasons</b> (2)	<b>om</b> (1)	<b>similar</b> (2)	<b>speakers</b> (12)
<b>Seattle</b> (1)	<b>settlement</b> (2)	<b>simple</b> (4)	<b>speaking</b> (15)
<b>Second</b> (49)	<b>seven</b> (28)	<b>simply</b> (1)	<b>speaks</b> (5)
<b>secondary</b> (1)	<b>seven-hour</b> (1)	<b>simulacrum</b> (3)	<b>Specialist</b> (30)
<b>seconds</b> (1)	<b>Sevenish</b> (1)	<b>s-i-m-u-l-a-c-u-r-m</b> (1)	<b>specific</b> (88)
<b>secret</b> (1)	<b>severance</b> (1)	<b>Simultaneous</b> (12)	<b>specifically</b> (36)
<b>secretary</b> (18)	<b>sex</b> (22)	<b>single</b> (7)	<b>specificity</b> (9)
<b>secrets</b> (1)	<b>sexual</b> (120)	<b>sir</b> (1)	<b>specifics</b> (6)
<b>section</b> (4)	<b>sexually</b> (10)	<b>sister</b> (1)	<b>specified</b> (1)
<b>security</b> (8)	<b>sgold@discrimlaw.net</b>	<b>sit</b> (7)	<b>specifity</b> (1)
<b>seder</b> (1)	<b>(1)</b>	<b>site</b> (1)	<b>speculation</b> (2)
<b>see</b> (71)	<b>shades</b> (1)	<b>sits</b> (1)	<b>speech</b> (1)
<b>seeing</b> (6)	<b>shaking</b> (1)	<b>Sitting</b> (12)	<b>spell</b> (1)
<b>seeking</b> (2)	<b>share</b> (12)	<b>situation</b> (2)	<b>spelled</b> (1)
<b>seeks</b> (1)	<b>shared</b> (2)	<b>six</b> (15)	<b>spelling</b> (1)
<b>seen</b> (7)	<b>Shargel</b> (4)	<b>sixth</b> (1)	<b>spend</b> (3)
<b>sees</b> (2)	<b>S-h-a-r-g-e-l</b> (1)	<b>Skype</b> (1)	<b>spending</b> (3)
<b>see-through</b> (1)	<b>sharing</b> (3)	<b>sleep</b> (2)	<b>spent</b> (6)
<b>segmented</b> (1)	<b>sheet</b> (1)	<b>slept</b> (4)	<b>spiral</b> (1)
<b>select</b> (1)	<b>Sheffield</b> (1)	<b>slow</b> (15)	<b>spoke</b> (32)
<b>self-destructive</b> (1)	<b>shelf</b> (1)	<b>slower</b> (2)	<b>spoken</b> (6)
<b>self-empowerment</b> (1)	<b>shelter</b> (1)	<b>slowly</b> (1)	<b>sponsor</b> (1)
<b>self-proclivities</b> (1)	<b>Shield</b> (1)	<b>smile</b> (1)	<b>sports</b> (1)
<b>semester</b> (2)	<b>Shikunov</b> (1)	<b>smiled</b> (2)	<b>spousal</b> (1)
<b>semesters</b> (1)	<b>Shikunov's</b> (1)	<b>SMITH</b> (25)	<b>spread</b> (3)
<b>seminar</b> (5)	<b>Shimel</b> (2)	<b>Smith's</b> (1)	<b>spreading</b> (1)
<b>seminary</b> (1)	<b>shoes</b> (1)	<b>smoke</b> (3)	<b>spring</b> (2)
<b>Senator</b> (2)	<b>Shoot</b> (2)	<b>smoked</b> (2)	<b>Stacey</b> (1)
<b>send</b> (9)	<b>short</b> (1)	<b>smoking</b> (2)	<b>stack</b> (1)

<b>staff</b> (34)	<b>study</b> (1)	<b>tamper</b> (1)	<b>thorough</b> (1)
<b>stages</b> (1)	<b>studying</b> (2)	<b>tampering</b> (1)	<b>thought</b> (11)
<b>staggered</b> (1)	<b>stuff</b> (8)	<b>tape</b> (7)	<b>thousand</b> (3)
<b>stamp</b> (2)	<b>style</b> (20)	<b>task</b> (1)	<b>thousands</b> (8)
<b>stamped</b> (1)	<b>subject</b> (14)	<b>taught</b> (1)	<b>thread</b> (1)
<b>stamps</b> (1)	<b>subjected</b> (3)	<b>Tavern</b> (1)	<b>threatened</b> (1)
<b>stand</b> (1)	<b>submit</b> (2)	<b>tax</b> (1)	<b>threats</b> (2)
<b>stands</b> (10)	<b>subordinates</b> (1)	<b>teach</b> (1)	<b>three</b> (45)
<b>start</b> (21)	<b>subsequent</b> (2)	<b>teaching</b> (2)	<b>throat</b> (1)
<b>started</b> (48)	<b>Sudan</b> (1)	<b>team</b> (3)	<b>Thursday</b> (1)
<b>starting</b> (9)	<b>sudden</b> (7)	<b>technical</b> (1)	<b>ticket</b> (1)
<b>starts</b> (4)	<b>sue</b> (2)	<b>technological</b> (1)	<b>tickets</b> (1)
<b>state</b> (3)	<b>sued</b> (7)	<b>technology</b> (1)	<b>Tiffany</b> (11)
<b>statement</b> (15)	<b>suggest</b> (5)	<b>Telegraphic</b> (1)	<b>time</b> (155)
<b>statements</b> (3)	<b>suggested</b> (4)	<b>telephone</b> (5)	<b>times</b> (28)
<b>STATES</b> (11)	<b>suggestion</b> (2)	<b>tell</b> (105)	<b>tired</b> (1)
<b>statute</b> (1)	<b>Suite</b> (3)	<b>telling</b> (20)	<b>tissue</b> (1)
<b>statutes</b> (1)	<b>sum</b> (1)	<b>Tells</b> (4)	<b>title</b> (31)
<b>stay</b> (11)	<b>summer</b> (1)	<b>ten</b> (9)	<b>titles</b> (3)
<b>stayed</b> (6)	<b>Superbowl</b> (2)	<b>ten-minute</b> (1)	<b>titular</b> (1)
<b>stealing</b> (3)	<b>supervising</b> (1)	<b>tens</b> (3)	<b>today</b> (43)
<b>Stein</b> (1)	<b>supervisor</b> (3)	<b>tenth</b> (2)	<b>Today's</b> (7)
<b>stenographer</b> (9)	<b>supplemental</b> (1)	<b>tenure</b> (1)	<b>told</b> (77)
<b>stenographer's</b> (1)	<b>support</b> (1)	<b>term</b> (5)	<b>Tommo</b> (8)
<b>stenographic</b> (3)	<b>supported</b> (1)	<b>termination</b> (1)	<b>Tommy</b> (19)
<b>stenographically</b> (1)	<b>supposed</b> (5)	<b>terms</b> (14)	<b>Toomey</b> (1)
<b>step</b> (2)	<b>Sure</b> (95)	<b>test</b> (4)	<b>top</b> (3)
<b>steps</b> (2)	<b>surreptitiously</b> (1)	<b>TESTIFIED</b> (14)	<b>topic</b> (2)
<b>stern</b> (1)	<b>surrounded</b> (1)	<b>testify</b> (10)	<b>topics</b> (3)
<b>Steve</b> (7)	<b>surrounding</b> (4)	<b>testifying</b> (7)	<b>total</b> (5)
<b>Steven</b> (2)	<b>Susuni</b> (2)	<b>testimony</b> (39)	<b>totality</b> (8)
<b>stole</b> (1)	<b>Swazetti</b> (1)	<b>Texas</b> (1)	<b>totally</b> (4)
<b>stolen</b> (8)	<b>swear</b> (1)	<b>Text</b> (41)	<b>touched</b> (4)
<b>stop</b> (36)	<b>SWORN</b> (1)	<b>texted</b> (1)	<b>tough</b> (2)
<b>stopped</b> (6)	<b>system</b> (9)	<b>textual</b> (1)	<b>town</b> (2)
<b>stored</b> (1)	<b>systems</b> (2)	<b>Thank</b> (33)	<b>TR.news</b> (2)
<b>stories</b> (10)	<b>Szott</b> (8)	<b>thanking</b> (1)	<b>track</b> (8)
<b>story</b> (44)	<b>S-z-o-t-t</b> (2)	<b>theft</b> (1)	<b>trade</b> (3)
<b>straight</b> (2)		<b>theme</b> (1)	<b>trading</b> (1)
<b>strategy</b> (8)	<b>&lt; T &gt;</b>	<b>thief</b> (1)	<b>trafficked</b> (1)
<b>Street</b> (3)	<b>table</b> (5)	<b>thigh</b> (1)	<b>training</b> (1)
<b>strength</b> (1)	<b>taglines</b> (1)	<b>thing</b> (35)	<b>transcript</b> (4)
<b>strike</b> (5)	<b>take</b> (76)	<b>things</b> (38)	<b>transfer</b> (7)
<b>structure</b> (3)	<b>taken</b> (15)	<b>think</b> (186)	<b>transferred</b> (2)
<b>structures</b> (1)	<b>takes</b> (2)	<b>thinking</b> (4)	<b>transfers</b> (5)
<b>student</b> (1)	<b>talk</b> (59)	<b>thinks</b> (3)	<b>transition</b> (1)
<b>students</b> (2)	<b>talked</b> (25)	<b>third</b> (7)	<b>transmit</b> (1)
<b>studied</b> (1)	<b>talking</b> (168)	<b>Thomas</b> (78)	<b>travel</b> (10)
<b>studies</b> (6)	<b>talks</b> (3)	<b>Thomas's</b> (4)	<b>traveled</b> (4)

<b>traveling</b> (3)	<b>understanding</b> (18)	<b>version</b> (26)	<b>wasting</b> (2)
<b>travels</b> (1)	<b>understood</b> (4)	<b>versions</b> (20)	<b>watch</b> (1)
<b>treasurer</b> (1)	<b>unenumerated</b> (1)	<b>versus</b> (8)	<b>watched</b> (1)
<b>treating</b> (1)	<b>unethical</b> (2)	<b>vested</b> (2)	<b>watching</b> (1)
<b>trial</b> (1)	<b>unhappy</b> (1)	<b>vexatious</b> (1)	<b>water</b> (3)
<b>Tribune</b> (1)	<b>unilaterally</b> (1)	<b>Vi'adal</b> (2)	<b>wave</b> (1)
<b>Tricia</b> (51)	<b>unique</b> (1)	<b>V-i-'-a-d-a-l</b> (1)	<b>way</b> (58)
<b>Tricia's</b> (2)	<b>UNITED</b> (25)	<b>Vibrant</b> (1)	<b>ways</b> (4)
<b>trick</b> (3)	<b>units</b> (1)	<b>vice</b> (1)	<b>wealth</b> (1)
<b>tried</b> (6)	<b>Universal</b> (1)	<b>victim</b> (8)	<b>web</b> (3)
<b>trip</b> (8)	<b>universities</b> (1)	<b>video</b> (36)	<b>website</b> (12)
<b>trips</b> (7)	<b>University</b> (15)	<b>videographer</b> (1)	<b>wedding</b> (2)
<b>true</b> (16)	<b>unluckiest</b> (2)	<b>videos</b> (1)	<b>weddings</b> (1)
<b>Trump</b> (1)	<b>unplausible</b> (1)	<b>view</b> (1)	<b>Wednesday</b> (2)
<b>trust</b> (1)	<b>unproven</b> (1)	<b>village</b> (1)	<b>weed</b> (1)
<b>truth</b> (2)	<b>unquote</b> (3)	<b>villages</b> (1)	<b>week</b> (1)
<b>truthful</b> (1)	<b>unraveling</b> (1)	<b>violate</b> (2)	<b>weekend</b> (2)
<b>truthfulness</b> (2)	<b>UNRWA</b> (1)	<b>violated</b> (1)	<b>weeks</b> (12)
<b>try</b> (33)	<b>untrue</b> (2)	<b>violation</b> (2)	<b>welcome</b> (5)
<b>trying</b> (99)	<b>unwanted</b> (8)	<b>violations</b> (3)	<b>well</b> (226)
<b>Tuesday</b> (3)	<b>unwelcoming</b> (1)	<b>violent</b> (1)	<b>went</b> (75)
<b>Turkish</b> (1)	<b>updated</b> (1)	<b>violently</b> (2)	<b>we're</b> (130)
<b>turned</b> (5)	<b>upload</b> (2)	<b>Virginia</b> (1)	<b>West</b> (2)
<b>turnover</b> (1)	<b>uploaded</b> (1)	<b>virtue</b> (1)	<b>western</b> (4)
<b>turns</b> (1)	<b>upper</b> (1)	<b>virus</b> (1)	<b>WeTransfer</b> (1)
<b>TV</b> (1)	<b>upset</b> (1)	<b>Visa</b> (1)	<b>we've</b> (13)
<b>twenty</b> (5)	<b>upstairs</b> (5)	<b>visit</b> (1)	<b>whatchamacallit</b> (1)
<b>twice</b> (6)	<b>Urban</b> (2)	<b>Vladimir</b> (1)	<b>WhatsApp</b> (1)
<b>two</b> (88)	<b>urinated</b> (1)	<b>voice</b> (2)	<b>whatsoever</b> (1)
<b>type</b> (3)	<b>use</b> (5)	<b>voices</b> (2)	<b>When's</b> (1)
<b>typed</b> (3)	<b>user</b> (1)	<b>volunteer</b> (2)	<b>whipped</b> (1)
<b>types</b> (2)	<b>usually</b> (3)	<b>volunteered</b> (3)	<b>whisper</b> (7)
<b>typo</b> (8)	<b>usurpers</b> (4)	<b>volunteers</b> (2)	<b>whispering</b> (2)
<b>typos</b> (1)	<b>U-s-u-r-p-e-r-s</b> (1)	<b>vs</b> (1)	<b>whistleblowers</b> (1)
	<b>UTC</b> (1)		<b>white</b> (2)
<b>&lt; U &gt;</b>		<b>&lt; W &gt;</b>	<b>wholly</b> (1)
<b>U.S</b> (1)	<b>&lt; V &gt;</b>	<b>wait</b> (13)	<b>wide</b> (1)
<b>UAF</b> (1)	<b>vacation</b> (4)	<b>waiting</b> (6)	<b>wife</b> (2)
<b>Uber</b> (6)	<b>vacations</b> (1)	<b>Wales</b> (1)	<b>WILLIAM</b> (1)
<b>Uh-huh</b> (3)	<b>vaccines</b> (1)	<b>walking</b> (4)	<b>willing</b> (5)
<b>UK</b> (7)	<b>validity</b> (1)	<b>walls</b> (1)	<b>window</b> (2)
<b>ultimate</b> (1)	<b>Valley</b> (2)	<b>Walsh</b> (1)	<b>wink</b> (13)
<b>un</b> (1)	<b>variety</b> (1)	<b>Walton</b> (3)	<b>wired</b> (1)
<b>unacceptable</b> (1)	<b>Vasili</b> (3)	<b>want</b> (143)	<b>wires</b> (1)
<b>unapproved</b> (1)	<b>vendors</b> (1)	<b>wanted</b> (13)	<b>wish</b> (2)
<b>uncomfortable</b> (3)	<b>venue</b> (3)	<b>War</b> (3)	<b>withdraw</b> (1)
<b>unconventional</b> (1)	<b>veracity</b> (6)	<b>Washington</b> (8)	<b>WITNESS</b> (103)
<b>underneath</b> (2)	<b>verbally</b> (1)	<b>waste</b> (1)	<b>witnessed</b> (3)
<b>understand</b> (72)	<b>verify</b> (2)	<b>wasted</b> (1)	<b>witnesses</b> (5)

**witnessing** (1)  
**witness's** (2)  
**Wolf** (1)  
**Wolson** (3)  
**woman** (19)  
**woman's** (1)  
**women** (16)  
**women's** (5)  
**wondering** (1)  
**word** (11)  
**wording** (2)  
**words** (7)  
**work** (46)  
**workaround** (1)  
**worked** (16)  
**worker** (2)  
**working** (21)  
**workplace** (2)  
**works** (5)  
**world** (3)  
**worried** (1)  
**worry** (3)  
**worst** (1)  
**worth** (1)  
**worthy** (1)  
**wow** (2)  
**wrap** (2)  
**wrapped** (1)  
**wrestler** (3)  
**write** (7)  
**writes** (3)  
**writing** (6)  
**written** (7)  
**wrong** (12)  
**wrote** (16)

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**yank** (2)  
**yanked** (6)  
**Yeah** (134)  
**year** (20)  
**years** (25)  
**yell** (3)  
**yelled** (1)  
**Yeshiva** (1)  
**yesterday** (14)  
**Yisrael** (1)  
**Y-i-s-r-a-e-l** (1)  
**Yonchek** (11)

**Yonchek's** (1)  
**Yosef** (1)  
**Yusef** (1)  
  
 < Z >  
**Ze'ev** (2)  
**Z-e-'-e-v** (1)  
**zero** (1)  
**Ziv** (9)  
**zone** (1)  
**zones** (1)  
**Zoo** (2)  
**Zoom** (12)